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American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

PUCO

May 29, 2009

Richard Reese
Assistant Consumers' Counsel
10 West Broad Street
Columbus, OH 43215

Re: Electric PIPP/Home Energy Level Payment Plan HELPP

Dear Rick,

Matthew J. Satterwhite
Counsel -
Regulatory Services
(614) 716-1915 (P)
(614) 716-2014 (F)
mjsatterwhite@aep.com

This letter is in response to your May 1, 2009 letter expressing concerns with AEP Ohio's issues and timeline for implementing the electric PIPP changes. AEP Ohio's letter was intended to put in writing what had already been shared with the Department of Development ("ODOD") in talks concerning implementation of the rules. AEP-Ohio shared with representatives from ODOD both prior to and after completion of the JCARR review that the timeline associated with the implementation of the changes would be a question.

In an effort to give ODOD a better idea of what AEP Ohio is facing, ODOD asked that we put our concerns in writing to provide something to start discussing what could be done and what could not. I am happy to report we have already begun to discuss our issues with ODOD and have been able to share some of the further clarifications we need in order to program the changes needed to implement the program.

The letter was filed in Commission docket 08-723-AU-ORD docket after the Commission appropriately recognized the difficulty in implementing a departure from the long established PIPP program in the gas industry and incorporated the implementation of the electric PIPP program in its comments. It makes sense for ODOD and the Commission to work together and roll out the different programs simultaneously to avoid customer confusion. AEP Ohio also wanted to make sure that ODOD took advantage of the experience of the Commission when facing the reality of making wholesale changes to programs involving public utilities.

This is not a rulemaking or litigated case; this is the implementation phase of new administrative rules. As such AEP Ohio will continue to work with ODOD and the Commission to implement the changes to the rules in the appropriate manner.

Sincerely,

Matthew J. Satterwhite

cc: PUCO Docket No. 08-723-AU-ORD
Janet Stoneking, Utilities Attorney, Ohio Department of Development

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