

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of a Portfolio)	
Plan Template for Electric Utility Energy)	Case No. 09-714-EL-UNC
Efficiency and Peak-Demand Reduction)	
Programs)	

**COMMENTS OF
COLUMBUS SOUTHERN POWER COMPANY
AND OHIO POWER COMPANY (AEP OHIO)**

AEP Ohio appreciates the opportunity to file comments in this docket. These comments address the proposed definitions of customer classes and the tables required for a filing.

The Commission proposes seven categories for customers. The categories include residential-non low-income, residential low-income, small enterprise, mercantile self direct, mercantile utility, governmental/non-profit, and transmission/distribution. AEP Ohio submits that the proposed definitions of customer classes are onerous and not achievable without significant billing system, tariff changes and market research expenses. AEP Ohio's recommendation is to segment customers into two categories: residential and non-residential.

The Companies do not have any means of accurately identifying low-income residential customers--other than those customers who have applied for PIPP and HEAP funding. Historically, third parties have identified low-income customers for program eligibility. And the Companies do not have specific rate categories for low-income customers.

AEP Ohio currently operates programs that are available for all customer classes broken down by residential and non-residential programs. AEP Ohio does not support adding further breakdowns of customer classifications. Our customer database does not contain all of the information that would allow us to distinguish these groups adequately. Further, AEP Ohio submits that these categories changes are not necessary, given that energy efficiency measures are typically applicable across most customer segments and marketed across segments. If the Commission is attempting to set reporting requirements that force AEP Ohio to market separately to those segments, those additional marketing and administrative costs would need to be apportioned to those segments, yet this can not be done because AEP Ohio rates are not separated by those categories of customers. AEP Ohio does not oppose reporting in a separate category its own internal energy efficiency and peak demand response resources from facilities, transmission and distribution.

AEP Ohio would also like to point out that the information requested in the table formats is duplicative. Cost data is requested several times in the 15 spreadsheets. The rules state that cost-effectiveness is determined at the portfolio level. The spreadsheets require filing at the program and measure level. If the Commission has redefined the level of cost-effectiveness requirement that needs to be directly provided for in the rules so that the utilities and other stakeholders are aware of such a significant change.

Section 4928.66(B), Ohio Rev. Code, does not require quarterly reporting and AEP Ohio objects to a requirement for quarterly reporting.

AEP Ohio thanks the Commission for the opportunity to submit comments on this subject.

Respectfully submitted,

/s/

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/11/2009 2:50:21 PM

in

Case No(s). 09-0714-EL-UNC

Summary: Comments Comments of AEP OH electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company and Columbus Southern Power Company