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**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company to Adjust Their)
Economic Development Cost Recovery)
Rider Pursuant to Rule 4901:1-38-08 (A)(5),)
Ohio Administrative Code.)

PUCO

Case No. 10-154-EL-RDR

**COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S
MEMORANDUM CONTRA
INDUSTRIAL ENERGY USERS-OHIO'S
APPLICATION FOR REHEARING**

Columbus Southern Power Company (CSP) and Ohio Power Company (OPCO), collectively AEP Ohio, filed their application in this case on February 8, 2010. The application, which was filed pursuant to §4901:1-38-08 (A), Ohio Admin. Code, proposed modest adjustments to AEP Ohio's Economic Development Cost Recovery riders (EDR) -- a decrease for CSP and an increase for OPCO.

As noted in the Commission's March 24, 2010 Finding and Order in this docket, Industrial Energy Users-Ohio (IEU) filed comments concerning the application. The Commission properly rejected IEU's arguments raised in those comments. As is clear from the Commission's discussion of IEU's arguments, they amounted to nothing more than a rehash of the same arguments considered and rejected by the Commission in Case No. 09-1095-EL-RDR.¹

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¹ In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company to Adjust Their Economic Development Cost Recovery Rider Rates.

Not to be discouraged, IEU raises the same four arguments on rehearing that the Commission repeatedly, and correctly, has rejected. Pursuant to §4901-1-35 (B), Ohio Admin. Code, AEP Ohio files this memorandum contra and urges the Commission to reject IEU's arguments once again.

Rather than further burdening this record with a repeat of AEP Ohio's arguments rebutting IEU's comments, and now its application for rehearing, AEP Ohio incorporates into this *Memorandum Contra* its Response to IEU's Comments, filed in this case on March 8, 2010, its February 16, 2010 Memorandum Contra IEU's Application for Rehearing in Case No. 09-1095-EL-RDR and pages 5 and 6 of AEP Ohio's December 9, 2009 Memorandum Contra IEU's Motion for a Hearing in Case No. 09-1095-EL-RDR.²

IEU has not raised any new arguments to support its application for rehearing. The arguments it continues to raise should be rejected, and rehearing denied, for the reasons already expressed by the Commission and the reasons presented by AEP Ohio in the pleadings referred to above.

Respectfully submitted,



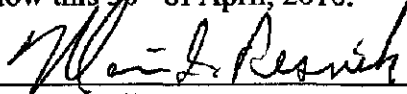
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² The paragraph beginning at the bottom of page 5 and concluding on page 6 addresses issue No. 4 raised in IEU's present application for rehearing regarding the carrying cost rate for the EDR.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Columbus Southern Power Company's and Ohio Power Company's Memorandum Contra IEU-Ohio's Application for Rehearing was served by U.S. Mail upon the individuals listed below this 30th of April, 2010.



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