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February 25, 2011

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

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PUCO

In re: Case No. 10-2376-EL-UNC

Dear Sir/Madam:

Please find enclosed the original and twenty (20) copies of **THE INITIAL COMMENTS OF THE OHIO ENERGY GROUP** fax-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

DFBkew  
Encl.  
Cc: Certificate of Service

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## CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 25<sup>th</sup> day of February, 2011 to the following:



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**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application of Ohio Power :  
Company and Columbus Southern Power Company : **Case No. 10-2376-EL-UNC**  
for Authority to Merge and Related Approvals :

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**INITIAL COMMENTS OF  
THE OHIO ENERGY GROUP**

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Pursuant to the Public Utility Commission of Ohio's ("Commission") invitation of February 9, 2011 in this case, Ohio Energy Group ("OEG") submits the following very brief statement on the AEP filing. Apart from many issues that have been raised in the on-going AEP filings, and particularly the AEP ESP filing, OEG can identify only one issue which will not be better addressed in those separate cases and therefore, should be addressed in this one. As always in these merger cases, it is important to ensure that the ratepayers benefit from any savings occasioned by the merger of CSP and Ohio Power. OEG hopes and expects that the Commission will address this issue in any forthcoming hearings.

Respectfully submitted,



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February 25, 2011

**COUNSEL FOR THE OHIO ENERGY GROUP**