

LARGE FILING SEPARATOR SHEET

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APPLICATION & SCHEDULES

EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-351-EL-AIR
Their Proposed Merger is Approved, as a)	Case No. 11-352-EL-AIR
Merged Company (collectively, AEP Ohio))	
for an Increase in Electric Distribution Rates)	

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-353-EL-ATA
Their Proposed Merger is Approved, as a)	Case No. 11-354-EL-ATA
Merged Company (collectively AEP Ohio))	
for Tariff Approval)	

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-356-EL-AAM
Their Proposed Merger is Approved, as a)	Case No. 11-358-EL-AAM
Merged Company (collectively AEP Ohio))	
for Approval to Change Accounting)	
Methods)	

**VOLUME SIX
STANDARD FILING REQUIREMENTS
SCHEDULE S-4.2**

(PART 3 of 4)

American Electric Power

and subsidiaries

Columbus Southern Power Company and Ohio Power Company

DBA as AEP Ohio

Executive Summary Applicant Utilities'

Management Policies, Practices and Organization

Schedule S-4.2

Part 3 of 4

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American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (c) (i, ii, iii, iv and v) and (B) (9) (i) (iv, v and vii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2

Rates and Tariffs

SFR Reference

(B)(9)(c)(i)	The System or Program for Managing Rate Related Operations and Rate Reform Projects
(B)(9)(c)(ii)	Rate Program Analytical Process
(B)(9)(c)(iii)	Implementation Management
(B)(9)(c)(iv)	Customer Involvement
(B)(9)(c)(v)	Commission and Staff Reporting
(B)(9)(i)(iv)	Rate and Bill Impact Evaluation Process
(B)(9)(i)(v)	Customer Involvement
(B)(9)(i)(vii)	Innovative Rate and Tariff Processes

Department Objectives

The overall rate objectives of the AEP Rate Department (also known as the AEPSC Rate Department) and the CSP and OP operating companies (also known as AEP Ohio) is ensuring electric rates are fair and equitable to investors and customers. The AEPSC Rate Department ensures that rates are properly administered and result in all operating companies, including AEP Ohio, maintaining a reasonable and adequate level of financial integrity. In conjunction with this objective, the Rate Department strives to instill customer and investor confidence in utility/regulatory processes, activities and decisions.

The AEPSC Rate Department, as well as the AEP Ohio Rate Department, is involved with the system programs for managing rate-related operations and rate reform projects, the analytical rate program analytical process, managing the implementation of the rates and tariffs, customer involvement, and commission and staff reporting.

An objective of the AEPSC Rate Department is to ensure AEP Ohio, as well as other operating system companies', a) rates provide sufficient revenue to cover costs of providing adequate and reliable electric service, b) authorized revenue requirements are assigned in as fair and equitable a manner as possible using applicable cost allocation methodologies and c) rate structures are implemented in a manner that promotes the efficient and economical use of AEP systems and knowledge base.

Regarding rate program analytical processes, the overall objective of the AEPSC and AEP Ohio rate departments is to develop techniques and procedures necessary to support commission-mandated filing requirements and AEP System rate structures.

As for implementation management, the objective of the AEPSC Rate Department is to provide documented and consistent processes of implementing rate reform. This objective is achieved by reviewing rate design changes throughout the industry and across AEP jurisdictions, to evaluate and determine the affect of these changes on customer classes, individual customers and groups of end-use customers. AEP Ohio uses a best practices methodology formulated across the AEP System in implementing rate plans.

With respect to customer involvement, the overall objective of the AEPSC and AEP Ohio rate departments is to consider customers' interest in and likely response to new and different rate plans, using information from customer surveys, meetings with customer groups, various customer comments, and the statistical results of customer reactions and responses to various rate structure designs.

Finally, the AEPSC and AEP Ohio rate departments' objectives for commission and staff communication and reporting are to ensure clear, concise and timely communication to these areas. AEP strives to ensure that these organizations are informed about AEP Ohio's operations and rate reform programs, and that filings are made in a timely, consistent manner with commission requirements addressed.

I. Policy and Goal Setting

The AEPSC Rate Department ensures that the electric power furnished by AEP's operating units, including AEP Ohio, is provided under tariffs, and terms and conditions of service that are at all times equitable, promote conservation and efficient use of energy resources, and provide sufficient revenue to maintain each AEP operating company's and AEP's financial integrity within applicable state and federal regulations. The AEPSC Rate Department is overseen by the senior vice president - Regulatory Services. The senior vice president - Regulatory Services is responsible for recommending and implementing rate policies, including rate design and rate case management policies for the AEP System. Policies related to rates and tariffs are developed with input from the AEPSC Rate Department staff, as well as the various operating company rate departments across the AEP System. The policies are coordinated by AEPSC with special consideration given to unique situations in the varying states and operating companies. This collaborated approach assures that policies implemented are relevant to unique situations but also support the overall policies and operational goals of AEP.

Criteria used in the development of these policies and goals include uniformity -- to the degree practicable -- throughout the AEP System, conformity with applicable commission requirements, regulatory climate, environmental effect, societal effect, and financial and customer implications.

Goals are set each year at the department level and are designed to support the corporate goals and objectives. The senior vice president - Regulatory Services and the president and chief operating officer of AEP Ohio both have primary responsibility for establishing the departmental or operating company goals, respectively. Specific measurable goals are given to each section of the rate department, as well as to individual employees to further refine the departmental goals. Employee job performance reviews take into account the employees' success in achieving the established goals and objectives. The employees' performance, as it relates to the goal performance, is reviewed with employees through a series of review sessions throughout the year.

II. Strategic and Long-Range Planning

Goals of the AEPSC and AEP Ohio rate departments, hereby known as the Rate Department, are developed to support the long-term strategic plan. Planning within the Rate Department generally is aimed at these long-term strategies. These strategies include maintaining the financial integrity of the operating company while maintaining the viability of customers. The long-range plan consists of developing a formal budget against which actual costs are compared and monitored. The timing of rate case filings are driven by the timing of and in-service dates associated with critical infrastructure investments, minimum revenue requirements of the operating companies and the requirements associated with changes in legislation. When current earnings trends and operating forecasts determine the need for rate relief, the amount of rate relief is determined. From this point, Rate Department management balances the amount of increase required with the desire to prevent "rate shock" for customers.

Strategic planning requires working groups and committees within the Rate Department and across business units to plan for changes to ongoing processes and strategies as they relate to changes and trends in the utility industry. This commitment assures that AEP continues to lead industry initiatives while maintaining its corporate sustainability vision of being an energy leader through programs and technologies that protect people, manage AEP's effects on the environment, promote energy efficiency, provide for customer control over electricity usage and provide for greater access to renewable forms of energy and advanced clean energy technologies. AEP will work with regulators and other stakeholders to

achieve this through an approach that maximizes the positive economic, social and environmental effects of company operations. The associated working groups discuss various recommendations, evaluate data collected and work to reach a consensus on policy matters.

III. Organization Structure

The AEPSC Rate Department is managed by the senior vice president - Regulatory Services, who reports to the president - AEP Utilities. The AEP Ohio rate department is managed by the vice president - Regulatory and Finance, who reports to the AEP Ohio president and chief operating officer.

The AEPSC Rate Department is organized into RTO and NERC/CIP Compliance, pricing and analysis, case management, and regulatory project and compliance. The RTO and NERC/CIP department is responsible for development and advocacy of public policy, RTO policies and NERC cyber infrastructure protection and reliability compliance for the AEP System. The corporate pricing and analysis group is responsible for cost of service studies required for special and general rate filings, rate designs and developing and testing experimental or new rate designs. Case management coordinates the functions of regulatory filings to assure compliance with the rules, adherence to deadlines and consistency in filings across the AEP System. Regulatory project and compliance is responsible for special projects related to regulatory issues and compliance.

The AEP Ohio rate department is organized into the manager of regulatory operations and the manager of regulatory pricing and analysis. The manager of regulatory operations coordinates filings as they relate to rules and regulations of the Public Utility Commission of Ohio. The manager of regulatory pricing and analysis is responsible for the day-to-day administration of rates. This includes making all necessary rider filings, maintaining tariffs and working closely with customer services to provide information to be passed on to customers.

Due to the close working relationships between the AEPSC and Ohio rate departments, both groups are hereby referred to as the Rate Department. The group's organizational chart is attached as Exhibit 1.

IV. Decision-Making

Day-to-day operational decision making is accomplished collaboratively among various members of the corporate rate department and AEP Ohio rate department organizations. Decision making is a daily planning process and includes decisions such as the timing of regulatory filings, types of programs to implement based on operational effect, cost and benefit analysis recommendations, data collection, risk assessment, and revenue and earnings stability. Overarching decisions affecting corporate policy or profits are reviewed and discussed by Rate Department members with the senior vice president and AEP Ohio president who obtain, if necessary, approval from the AEP Executive Council, including the chairman and chief executive officer.

Planning is a collaboration of the corporate rate department, operating company rate department, case management and many support departments such as accounting, finance and functional teams. Planning begins with the need to file for rate relief, per commission rules, or due to new mandates. The collaboration during planning sessions happens through a series of conference calls, face-to-face meetings and working meetings.

There is an internal company view of financial operations due to rate relief and to maintaining a satisfactory rate of return and return on common equity. Rate structures are implemented that promote the efficient and economical use of the AEP System and improve operations if possible. Customer effects of rate filings also are recognized during the decision-making process. This aspect is in line with the AEP System objective of maintaining fair and equitable rates for investors and customers.

For the regulatory programs to be cost-effective, the effect should result in a net benefit to the System, shareholders and customers. For instance, the variable production cost of generating electricity usually is higher during the peak period. If a rate program shifts energy from peak to off-peak periods, the production cost is reduced, resulting in a benefit. The cost-benefit studies are analyzed and used to evaluate operating effects and risks, reinforce recommendations, and provide evidential support across AEP business units and to respective AEP stakeholders if necessary.

Data collection is an ongoing process. Load research can be analyzed in various forms to help guide the decision on the need for new tariff offerings. After a new tariff is offered, data collection will be analyzed to guide the decision in what worked and what did not work to improve future innovative tariff offerings.

Most programs involve some level of risk and uncertainty. This involves financial risks, and the risk associated with the customers' attitudes and acceptance of new rates. Some programs can be implemented on a test basis to allow adjustments as necessary to make the programs successful in the future.

AEP Ohio regularly monitors the effect of current rates on revenue and earnings stability within the state of Ohio. Decision processes are based on established AEP System policies and procedures, current industry trends, regulatory compliance and competitive response strategies. All these criteria can affect the revenue and earnings stability of the company. Strategies and decisions are amended and revised accordingly to maintain sufficient revenue to cover AEP Ohio's cost of providing adequate and reliable electric service.

Currently, AEP Ohio is reacting to new industry trends to bring time-of-use based rates to the forefront of customer education. This is being achieved through the company's gridSMART™ initiative. The company already has filed three new tariffs for this initiative and has taken part in a major customer education campaign. AEP Ohio also is participating in numerous new projects related to government mandates on energy efficiency, peak demand reduction and the use of renewable or alternative energy sources. The results of these programs can be evaluated over time as the data is collected and analyzed. This will allow the company to make changes to the programs as necessary to assure each program's success.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The execution of various functions and objectives are monitored and evaluated continuously by the senior vice president and AEP Ohio president for the operating company. There are controls in place to maintain the processes of the annual budget, regulatory compliance, complaint resolution, tariff implementation, information requests and rate filing status.

Each operating company in the AEP system is responsible for its operating budget. Budgetary guidelines are established annually by senior management consisting of personnel, salary and expense budgets. The director of finance for AEP Ohio is responsible for controlling expenditures within the department's approved budget. Monthly reviews are made and explanations of deviations from the approved budget are prepared for senior management.

The managers of regulatory operations, and regulatory pricing and analysis for AEP Ohio work together to maintain checklists of upcoming rate, rider and rule filings. This checklist is updated based on commission orders to assure compliance to orders as well as timelines. This control is in place for known filings only.

The manager of regulatory operations is responsible for reporting and attending to customer complaints and commission complaints. There is a procedure in place for staffing the phone lines, documenting and reporting complaints issues as well as complaint resolutions. A summary of complaints and resolutions is shared with senior management through quarterly staff meetings.

The manager of regulatory pricing and analysis is responsible for the maintenance of the company's tariffs. This responsibility includes filing revised tariffs with the tariff desk at the PUCO and in the docket where ordered, in a timely fashion. It is the manager's responsibility to approve the rate amounts entered in the customer billing system to assure correct billing and compliance with the order as the date for the rate change.

The process of rate filings and how to respond to information requests for these rate filings is coordinated through the corporate case management department with guidance and evaluation from the corporate and operating company regulatory departments. Assignment of duties relate to responsibility for schedules or studies in rate filings, testimony support, and answering requests for information. The case managers are responsible for meeting the deadline of a filing and complying with all of the rules and regulations of the filing.

When professional performance measures indicate a negative deviation from desired goals and objectives, action is taken to correct the procedure, re-examine goals for reasonableness, or evaluate other underlying reasons why the original goals have deviated.

VII. Internal and External Communications

Internal Communication

The senior vice president, and AEP Ohio president and chief operating officer communicate frequently with the executive officers of AEP and the operating companies about rate policies and activities. Such officers include the AEP chairman and chief executive officer, the AEP chief operating officer and other members of the AEP Executive Council.

Internal communications within the Rate Department is an every day occurrence that requires cooperation among all regulatory departments, corporate as well as the operating company. The importance of internal communication is evident in the decision making and planning processes of regulatory filings. Internal communication is accomplished through a variety of media – personal and telephone conversations, meetings and emails (both individual and group), video conferences, as well as through on-line portals.

Most internal communications are the result of case planning or strategy sessions. These meetings are frequent in nature and happen in a face-to-face environment or in teleconferences in the form of working groups. Here, much knowledge is shared throughout the different levels of experience and backgrounds of all employees.

Internal staff meetings are used to recap past performance, communicate goal achievement and discuss the need to make changes to future strategies due to changes in the regulatory arena. These staff meetings also are used as a control for senior management to gauge how the department is doing in whole and address risks and rewards in a timely manner. Due to the importance of safety in the AEP culture, most staff meetings are started by sharing a safety contact to remind employees of safety's importance.

Internal communication between the AEP Ohio regulatory department and the Customer Services department also is of great importance. This is the company's chance to listen to the input customers have shared with their representatives and address these questions and suggestions in future planning sessions. Additionally, an internal regulatory website can be accessed by employees of AEP through the company's internal website.

The communication mechanisms outlined above set communication across internal and external parties, while providing the Rate Department a mechanism to monitor and evaluate goal achievement.

External Communication

External communications can be formal and informal rate-related questions or inquiries from customers, the general public, other electric utilities, civic and government agencies, PUCO staff, independent energy consultants, etc. These contacts generally are followed by a formalized response to document the decisions reached, the action taken or to provide the requested information. AEP websites have been established with associated public information. Additionally, external websites are used to communicate information broadly, such as on the PJM or SPP websites, to our customers, commissions, stakeholders and shareholders.

The Rate Department normally has a representative at industry conferences and other public meetings related to the utility industry regulatory issues. These events provide opportunities for communication of the AEP position about various industry issues and exchange of ideas with commissions, other utilities, consultants, interveners of companies' rate proceedings and customers.

AEP Ohio's current gridSMART™ initiative has added to the company's external communication. The introduction to gridSMART™ requires extensive communication and education materials to the customer. This education is achieved through town meetings, flyers, bill messages and even a mobile unit that is

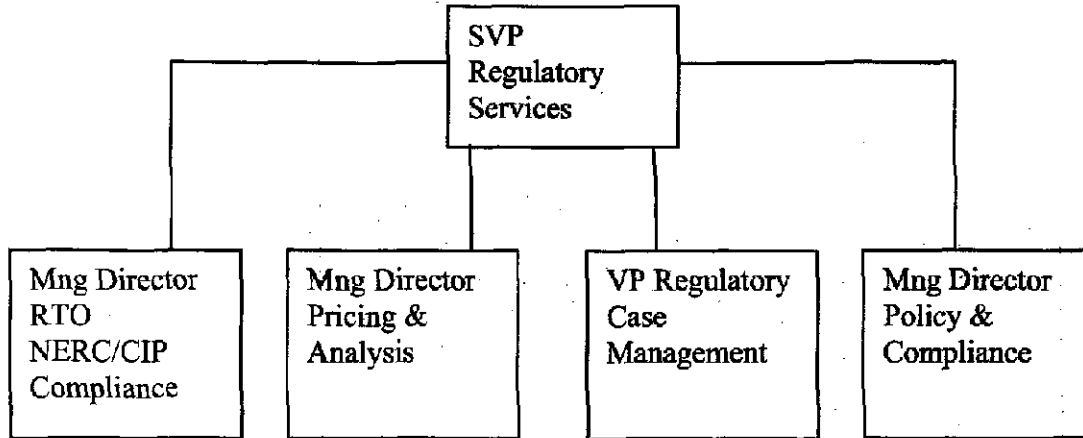
available for community events to educate large numbers of consumers about the importance of energy efficiency, the steps AEP Ohio has taken and how this will benefit the customer.

Finally, there is an objective to assure that the commission and its staff are informed about AEP Ohio operations and rate reform programs, and that filings are made in a timely manner consistent with commission requirements. Regulatory assures that all required reports are filed timely with the commission, and that information requested by the commission and staff is supplied promptly. Operating company personnel keep the staff and commission advised as to trends, potential problems and developing opportunities in matters of mutual interest.

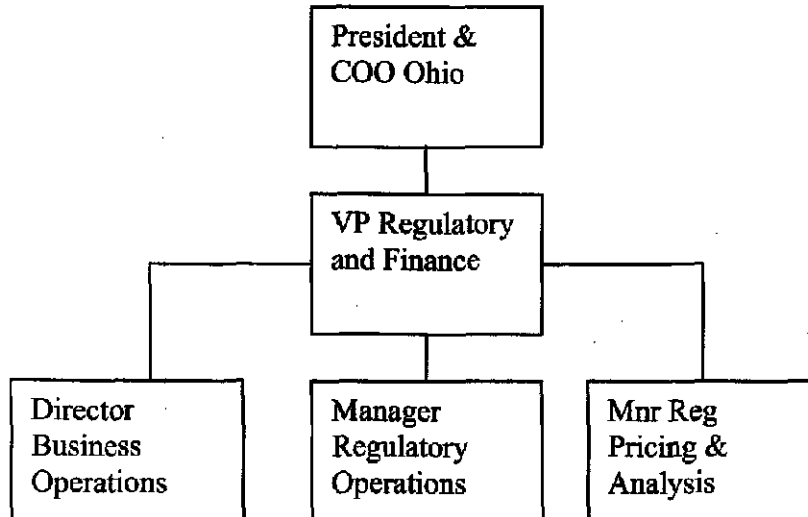
Formal status reports are filed with the PUCO periodically. An example would be the market monitoring reports due quarterly. AEP Ohio personnel have routine contact with the commission staff to review filings and share information as it arises.

Exhibit 1 – Rate Department Organizational Chart

AEP Corporate Organization Chart



AEP Ohio Organization Chart



American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (i, ii, iii, iv and v)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications – Overview

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(ii)	Credit and Collections
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective for the AEP Service Corporation Corporate Communications Department and the AEP Ohio Communications Department, which supports subsidiaries Columbus Southern Power (CSP) and Ohio Power Company (OP), is to provide needed information to AEP's and AEP Ohio's various publics – including the general public, legislators, regulators, shareholders, thought leaders, customers and employees. The two departments do not issue policy statements but support the corporate policies and provide communications counsel to senior management and members of the leadership team in the implementation of those policies.

Goals for both departments are established on an annual basis and are either segmented based on the organizations or functions within the department and/or based on strategic objectives set forth by the company. These goals support the strategic direction of AEP Service Corporation and/or AEP Ohio. From there, management and individual goals and objectives are outlined in direct correlation to the goals established for the department. Annually, the organization and its employees are measured on performance in relation to those goals and are provided feedback on their development on a monthly or quarterly basis.

Goals are tied for the most part to major initiatives or responsibilities within the department, including customer communication, advertising and corporate sponsorships, community involvement and corporate philanthropy, educational outreach, media relations, employee/retiree communications, internal and external web development, video production, social media, policy and thought leader communications, and energy efficiency/demand response support.

II. Strategic and Long-Range Planning

The vice president of Corporate Communications works with members of his team to establish strategic and long-range planning for the department. The planning process includes input provided by all team members through a bottom-up approach to leadership. In addition, feedback is received by members of the Executive Council as well as AEP business unit leaders and coordinated with each operating company communications director.

In concert with the planning process, the director of Communications for AEP Ohio also works with her team and members of AEP Ohio leadership to develop strategic and long-term plans for the department. Strategy sessions are conducted on an annual basis following strategy sessions held by the AEP Ohio leadership team. Ongoing dialogue, measurement and adjustments are made through weekly conference

calls, monthly net meetings and quarterly face-to-face meetings, as well as through individual goal discussions with team members.

III. Organization Structure

The AEPSC Corporate Communications Department is managed by the vice president of corporate communications, who reports to the AEP president, chairman and chief executive officer. The department is organized into the following sections: media relations and policy communications; social media; corporate communications, responsible for community involvement, corporate philanthropy, educational services, advertising and sponsorships; communication services, responsible for communications support of Generation, Transmission and Distribution business units; and communication services - interactive media, responsible for Internet and intranet design, development and management, video and webcast production, graphic design and user experience.

The AEP Ohio Communications Department is managed by the director of communications, who reports to the AEP Ohio president and chief operating officer. The department consists of eight employees collectively responsible for the following areas: internal and external communications, including customers, legislators, regulators, thought leaders and employees; advertising; media relations; consumer engagement and education for energy efficiency/demand response programs; coordination of marketing efforts; Internet and intranet development; and communication strategy development.

Although the director of AEP Ohio's Communications Department does not report directly to the AEPSC Corporate Communications vice president, the two organizations support a dotted-line reporting structure and coordinate communications planning. An organization chart for AEPSC Corporate Communications and AEP Ohio Communications is attached as Exhibit 1.

IV. Decision-Making

Decision making is accomplished through multiple approaches, depending on the circumstances. Day-to-day decision making is done by the appropriate leader, such as the vice president of AEPSC Corporate Communications, AEPSC Corporate Communications directors, or AEP Ohio Communications director, with input from staff members, necessary senior management and other departments. In many cases, decisions can be made on a day-to-day basis by lower level employees if that person is responsible for the task or project in question or needing a decision. Issues are brought to the attention of team members and leadership through weekly meetings and conference calls.

Emergency or unexpected situations requiring decision making are accomplished using key personnel within AEPSC Corporate Communications, AEP Ohio Communications, AEPSC Legal, AEPSC Human Resources, and other business units as required. In these situations, the vice president of AEPSC Corporate Communications enlists input from his direct reports, as well as senior management. If necessary, the vice president will coordinate with the AEP Ohio Communications director regarding issues and decisions that need to be made affecting the AEP Ohio service territory and its customers. The same process is in place for issues affecting the operating company that need to be brought to the attention of AEPSC.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of

PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Performance from both organizations (AEPSC Corporate Communications and AEP Ohio Communications) is reviewed on an ongoing basis through weekly meetings, monthly reports, budget variance reports, incentive performance reviews and best practice sharing.

VII. Internal and External Communications

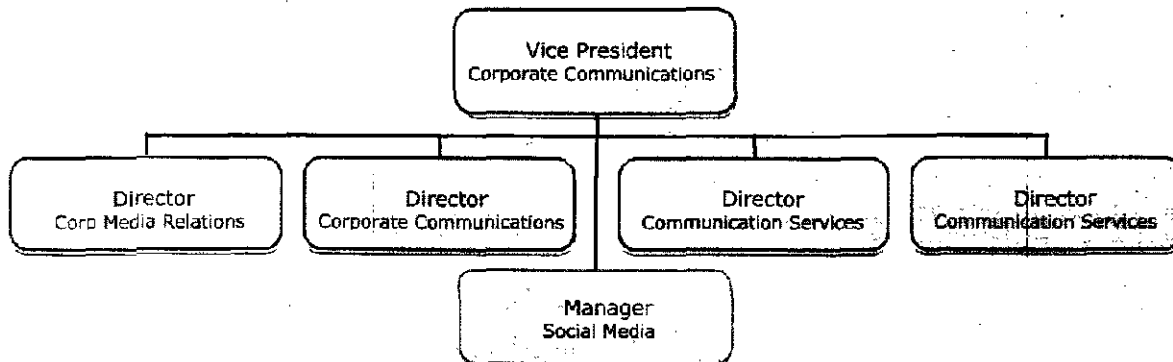
Internal and external outreach and communications for both companies center on providing key audiences and stakeholders accurate and timely information about the companies' activities and initiatives. For AEPSC and AEP Ohio, this is accomplished using a variety of media depending upon the audience and subject. For internal communication to employees and supervisors, both companies use the companies' internal websites (AEPNOW and AEPOHIONOW) to share information with employees, as well as store information for reference at a later time. Other mediums include webcasts, videos, sharepoint sites, databases, net meetings, face-to-face meetings, emails, talking points, fact sheets and other support material.

External communication to customers, legislators, regulators, stakeholders and thought leaders is accomplished through various means, including face-to-face discussions; telephone conversations with Customer Solution Center representatives; Internet sites, including aep.com, aepohio.com and gridsmartohio.com; direct mail; blast telephone messaging; AEP's Corporate Accountability Report; AEP's Community Connection Report (developed with specific information for each operating company); social media, including facebook, twitter and YouTube; as well as a monthly electronic newsletter developed by AEP Ohio for thought leaders throughout its service territory.

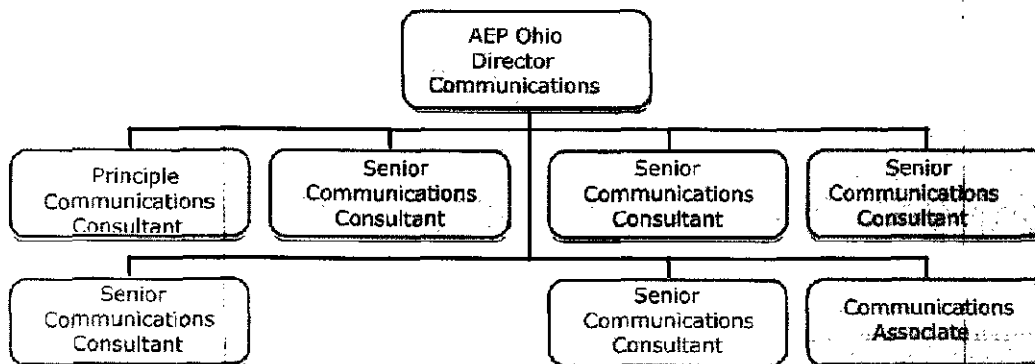
Examples of these communication tools are shown in report sections SFR (B)(9)(d)(i and iii).

Exhibit 1 – Corporate Communications Organization Charts

AEPSC Corporate Communications



AEP Ohio Corporate Communications



American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chap II Section (B) (9) (d) (i)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications

SFR Reference

(B)(9)(d)(i) Customer Service and Information

I. Policy and Goal Setting

The overall objective of the AEP Ohio Corporate Communications Department in regard to customer service and information is to provide timely, accurate and relevant information to internal and external customers through the use of modern communication practices. This objective includes the preparation, editing, production and distribution of oral, written and electronic communication materials needed by customer services for the general public, news media, customers and community leaders. This information may include business news, outage updates, safety messages, and resources for account services, environmental messages, and energy efficiency and conservation topics.

AEP Ohio Corporate Communications department establishes policies to recognize and support AEP corporate policies, as well as to enhance effective and efficient communication procedures. This includes providing timely, accurate and relevant information to internal and external customers, such as customer services.

Departmental goals and accomplishments are regularly reviewed and updated for the coming year.

II. Strategic and Long-Range Planning

Strategic planning includes an ongoing identification effort to identify and incorporate modern communication resources into the department's overall communication plan. This, in turn, benefits other departments, such as customer services, by ensuring flexibility for responding and distributing news and information. Departmental strategic planning involves identifying issues affecting AEP Ohio and the overall electric industry, identifying customer, general public and employee information needs as well as determining the most cost-effective methods to produce and distribute the information. Economic indicators and budget requirements are major factors in the planning process.

III. Organization Structure

AEP Ohio Corporate Communications is managed by the director – Communications, who reports directly to AEP Ohio's president and chief operating officer. The AEP Ohio Communications Department is comprised of the director, six communications consultants and a communications associate.

The group has general responsibility for internal and external communications, advertising and media relations for all AEP Ohio organizations, including customer services. The group also provides communications services to AEP Transmission and Generation organizations within AEP Ohio's service territory. Other areas of responsibility include Energy Efficiency and Peak Demand Response as well as the gridSMART Project.

IV. Decision-Making

The AEP Ohio Corporate Communications team makes decisions by working through the concerns involved in a particular issue and utilizing all available information. Due to the diversity of information provided to the company's various audiences, the decision making process can involve consultation among the communications director, the communication consultants and representatives of the Customer Service Department.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Several research tools are used to determine the effectiveness of communications with internal and external audiences. They include customer satisfaction surveys, website comments and feedback, comments made on social media (facebook, twitter, flickr), evaluations of public presentation and media tracking. Verbal communication with internal and external customers, including customer services, also is used to judge the effectiveness of communication methods. In addition, overall attitudes toward the company determine if there are specific changes that can be addressed through communications programs.

VII. Internal and External Communications

AEP Ohio Corporate Communications works with customer service representatives to provide information for customers and community leaders to promote healthy, informed dialogue about industry restructuring, the environment and a wide range of other regulatory and legislative issues. The total communications program is designed to provide a basis for the company's stakeholders to conveniently gain additional knowledge of the company and improve perceptions of the role energy plays in the community. The department works closely with news media and customer contact personnel to provide pertinent information and to increase public awareness and understanding of major issues.

Internal communication efforts help provide customer service representatives with accurate and timely information to help them better respond to their customers' needs. This information is provided through a variety of media, including internal website postings, newsletters, direct email/email communications, staff and safety meetings, webcasts, webinars and executive's field visits.

AEP Ohio's Corporate Communications external efforts are geared toward multiple venues and mass communications, most generally targeting customers with information covering many subjects, including energy use and conservation, safety, service interruptions, community involvement, operations and customer service.

Email correspondence, bill inserts/messages, advertising (Exhibit 1a, 1b, 1c), press releases/media advisories (Exhibit 2a, 2b), external website, social media and telephone messages are the primary methods reaching external audiences. Corporate Communications maintains and updates the company website, www.aepohio.com (Exhibit 3), ensuring the availability of timely and accurate information throughout the entire website. This site is the primary location for service restoration information during major outages (Exhibit 4a, 4b) situations. Social media is also included in AEP Ohio's external communications efforts. AEP Ohio maintains two facebook pages (Exhibits 5a, 5b), two Twitter accounts (Exhibits 6a, 6b) and a flickr account (Exhibit 7) in an effort to communicate in a more casual but timely manner.

AEP Ohio Community Connections (Exhibit 8a, 8b) is a monthly electronic newsletter distributed to thought leaders within the Ohio service territory. It provides a feedback loop for timely exchange of information. Editorial board meetings are conducted for local media executives when pertinent issues arise that could affect the company, customers and/or general area. These face-to-face meetings are intended to provide a solid understanding of issues for the media so they, in turn, use the information to accurately to write about the issues. Outbound telephone messages (Exhibit 9a, 9b) inform customers of scheduled power interruptions, power quality issues and corrective actions, as well as vegetation management information.

This external communication effort helps customer service representatives access accurate and timely information to allow them to better respond to their customers' needs. It also helps reduce customer inquiries by providing a variety of avenues by which customers can access accurate and timely information.

Exhibit 1A – <http://www.aep.com/about/ads/>

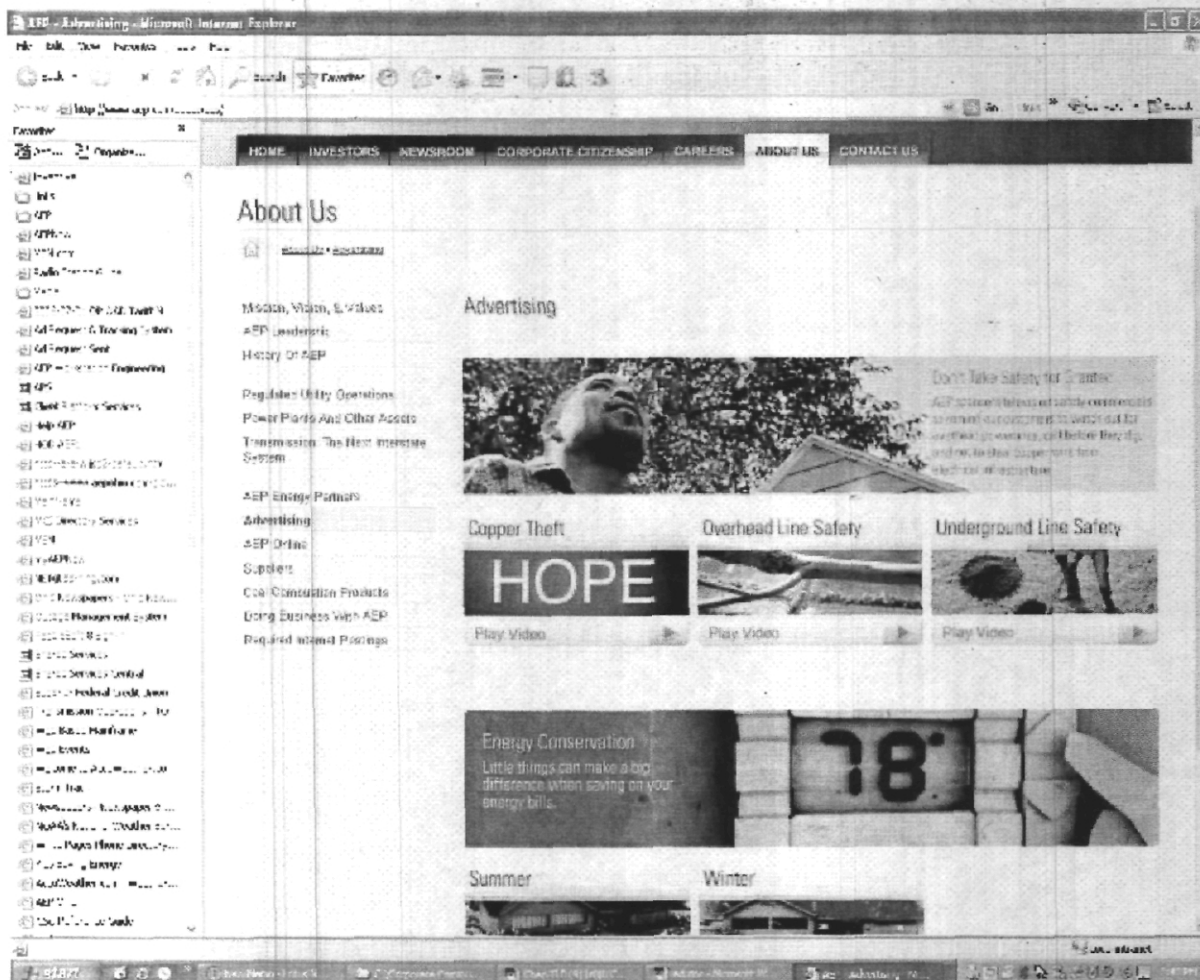
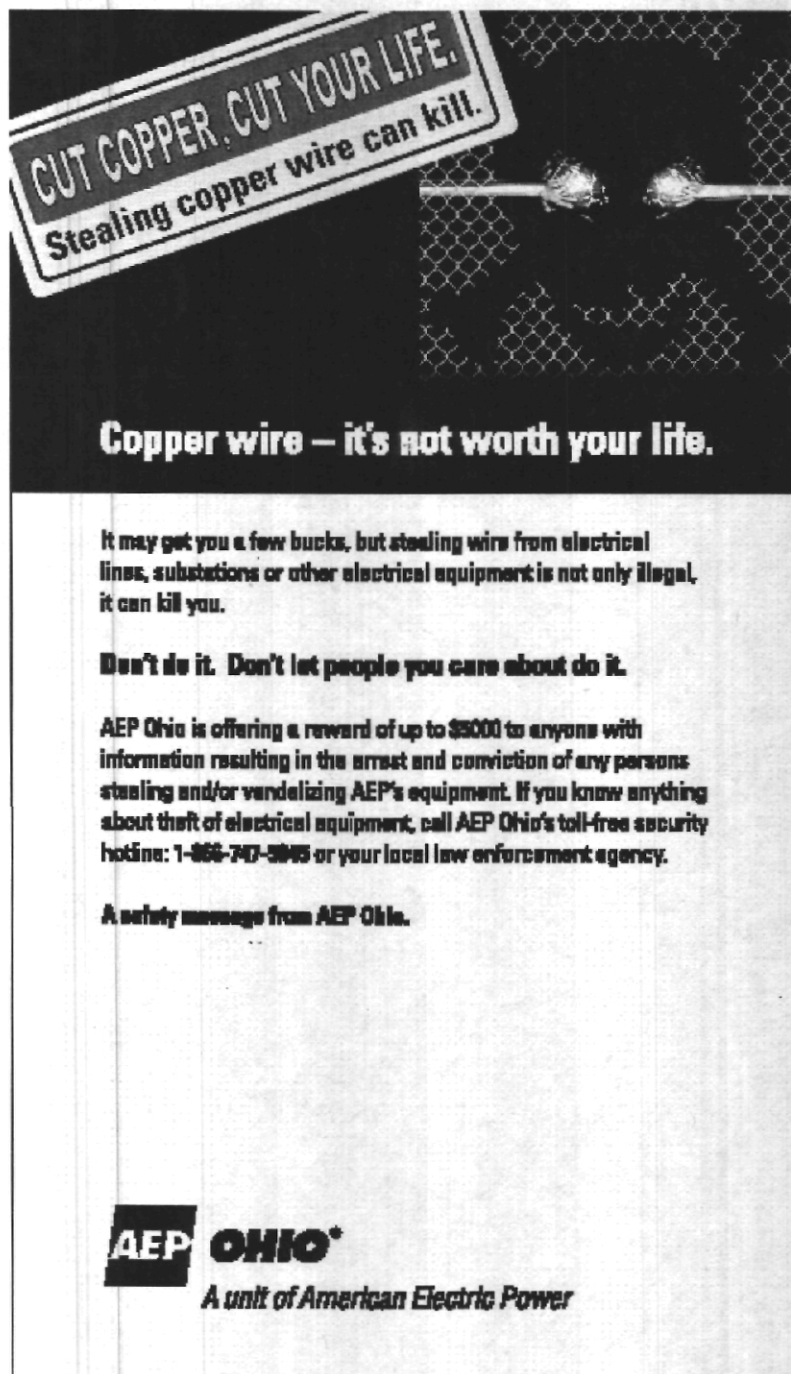


Exhibit 1B- Electrical Safety Ad



CUT COPPER. CUT YOUR LIFE.
Stealing copper wire can kill.

Copper wire - it's not worth your life.

It may get you a few bucks, but stealing wire from electrical lines, substations or other electrical equipment is not only illegal, it can kill you.

Don't do it. Don't let people you care about do it.

AEP Ohio is offering a reward of up to \$5000 to anyone with information resulting in the arrest and conviction of any persons stealing and/or vandalizing AEP's equipment. If you know anything about theft of electrical equipment, call AEP Ohio's toll-free security hotline: 1-866-747-5945 or your local law enforcement agency.

A safety message from AEP Ohio.

AEP OHIO*
A unit of American Electric Power

Exhibit 2A – <https://www.aepohio.com/info/>

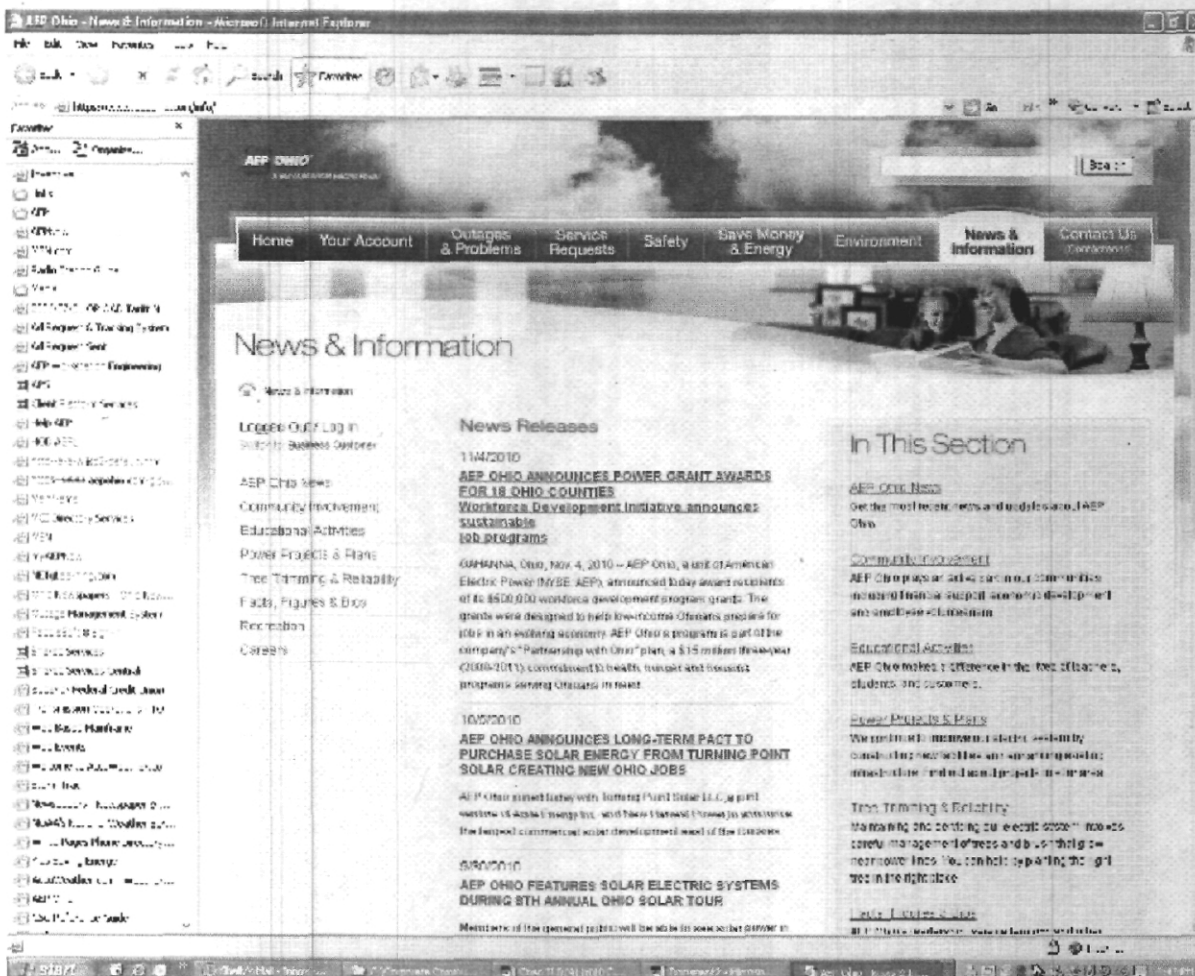


Exhibit 2B – News Release

(Exhibit 2b)



POWER

A unit of American Electric Power

NEWS from AEP Ohio

NEWS MEDIA CONTACT:

Terri Flora
AEP Ohio Corporate Communications
866-641-1151

FOR IMMEDIATE RELEASE

AEP OHIO ANNOUNCES POWER GRANT AWARDS FOR 18 OHIO COUNTIES
Workforce Development Initiative announces sustainable job programs

GAHANNA, Ohio, Nov. 4, 2010 – AEP Ohio, a unit of American Electric Power (NYSE: AEP), announced today award recipients of its \$500,000 workforce development program grants. The grants were designed to help low-income Ohioans prepare for jobs in an evolving economy. AEP Ohio's program is part of the company's "Partnership with Ohio" plan, a \$15 million three-year (2009-2011) commitment to health, hunger and housing programs serving Ohioans in need.

"AEP Ohio's goal is to help establish workforce development programs to prepare Ohioans for jobs in this struggling economy," said Joe Hamrock, AEP Ohio president and chief operating officer. "Today's announcement takes a meaningful step to developing the programs that will start to accomplish that goal."

AEP Ohio is providing 13 POWER (Putting Ohioans to Work for Economic Recovery) grants of up to \$100,000 to boards of County Commissions to fund workforce development proposals targeting low-income Ohioans within the AEP Ohio service territory. Low-income Ohioans include those who are at or below 200 percent of the 2009-2010 Federal Poverty Guidelines. The grants are being awarded to new programs that seek to prepare future employees for opportunities in Ohio's targeted industries identified by the Ohio Department of Development, and for retraining displaced workers to take advantage of new career opportunities.

AEP Ohio received 22 applications for the POWER grants. There are 18 counties represented in the 13 separate programs being awarded funds. Part of the requirement to apply

-more-

for the grants was to collaborate with other local and regional organizations to obtain matching funds for at least 25 percent of the proposed project's budget. In addition to the grant amounts received from AEP Ohio, the chosen programs have obtained over \$618,000 in matching funds and contributions from private businesses and other governmental programs.

All proposals were reviewed, evaluated and scored by a panel including representatives of leading institutions of higher learning in the State of Ohio. Representatives of AEP Ohio did not participate in proposal evaluations.

The counties being awarded POWER grants are:

Carroll County
Delaware County
Hocking County
Holmes County
Tuscarawas County
Athens and Perry Counties
Fairfield, Pickaway and Ross Counties
Hardin County
Monroe, Morgan and Noble Counties
Scioto County
Marion County
Belmont County
Franklin County

"AEP Ohio wanted to work with other businesses and government to help ease the burden Ohio families face," said Joseph Hamrock, AEP Ohio president and chief operating officer. "This initiative will help to prepare over 1400 Ohioans for the workforce moving forward."

AEP Ohio's Partnership With Ohio (PWO) Fund is a three-year \$15 million shareholder-funded program that provides additional help in the areas of health, hunger and housing to Ohio's needy families. The programs are designed to include families with incomes up to 200 percent of the federal poverty level, a segment of the population that often does not qualify for state and federal aid.

Since 2009, the company has provided through the PWO Fund over \$7.5 million to support regional food banks and United Way agencies, workforce development initiatives, direct bill payment assistance and weatherization efforts for low-income customers. AEP Ohio also has used the funding to support the company's Neighbor-to-Neighbor Program, which is designed to help low-income customers struggling to pay their electric bill. Other PWO contributions will be announced throughout 2010.

-more-

AEP Ohio provides electricity to nearly 1.5 million customers of major AEP subsidiaries Columbus Southern Power Company and Ohio Power Company in Ohio, and Wheeling Power Company in the northern panhandle of West Virginia. AEP Ohio is based in Gahanna, Ohio, and is a unit of American Electric Power.

American Electric Power is one of the largest electric utilities in the United States, delivering electricity to more than 5 million customers in 11 states. AEP ranks among the nation's largest generators of electricity, owning nearly 38,000 megawatts of generating capacity in the U.S. AEP also owns the nation's largest electricity transmission system, a nearly 38,000-mile network that includes more 705-kilovolt extra-high voltage transmission lines than all other U.S. transmission systems combined. AEP's transmission system directly or indirectly serves about 10 percent of the electricity demand in the Eastern Interconnection, the interconnected transmission system that covers 38 eastern and central U.S. states and eastern Canada, and approximately 11 percent of the electricity demand in ERCOT, the transmission system that covers much of Texas. AEP's utility units operate as AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric Power Company (in Arkansas, Louisiana and east Texas). AEP's headquarters are in Columbus, Ohio.

#

Exhibit 3 – www.aepohio.com

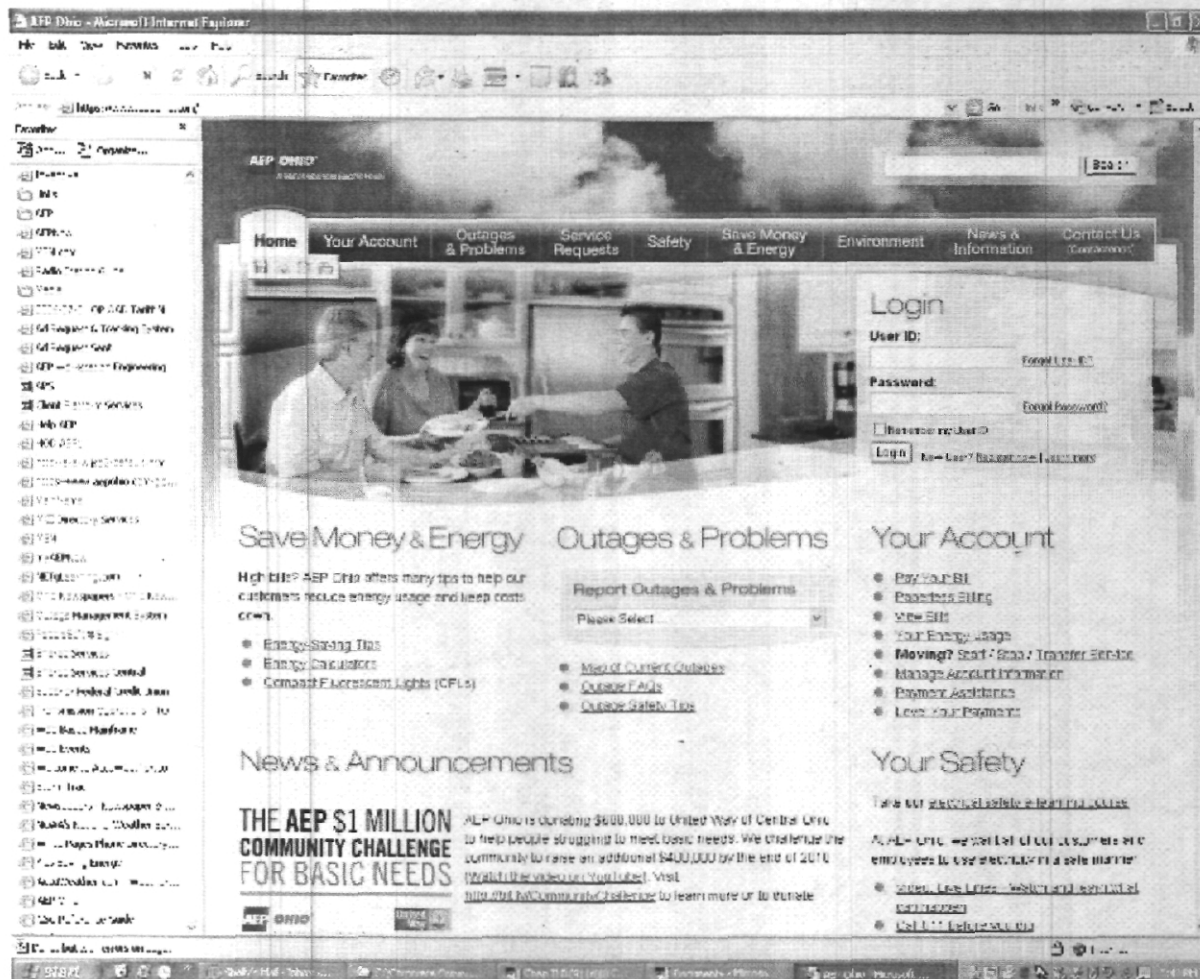


Exhibit 4A -- <https://www.aepohio.com/outages/>

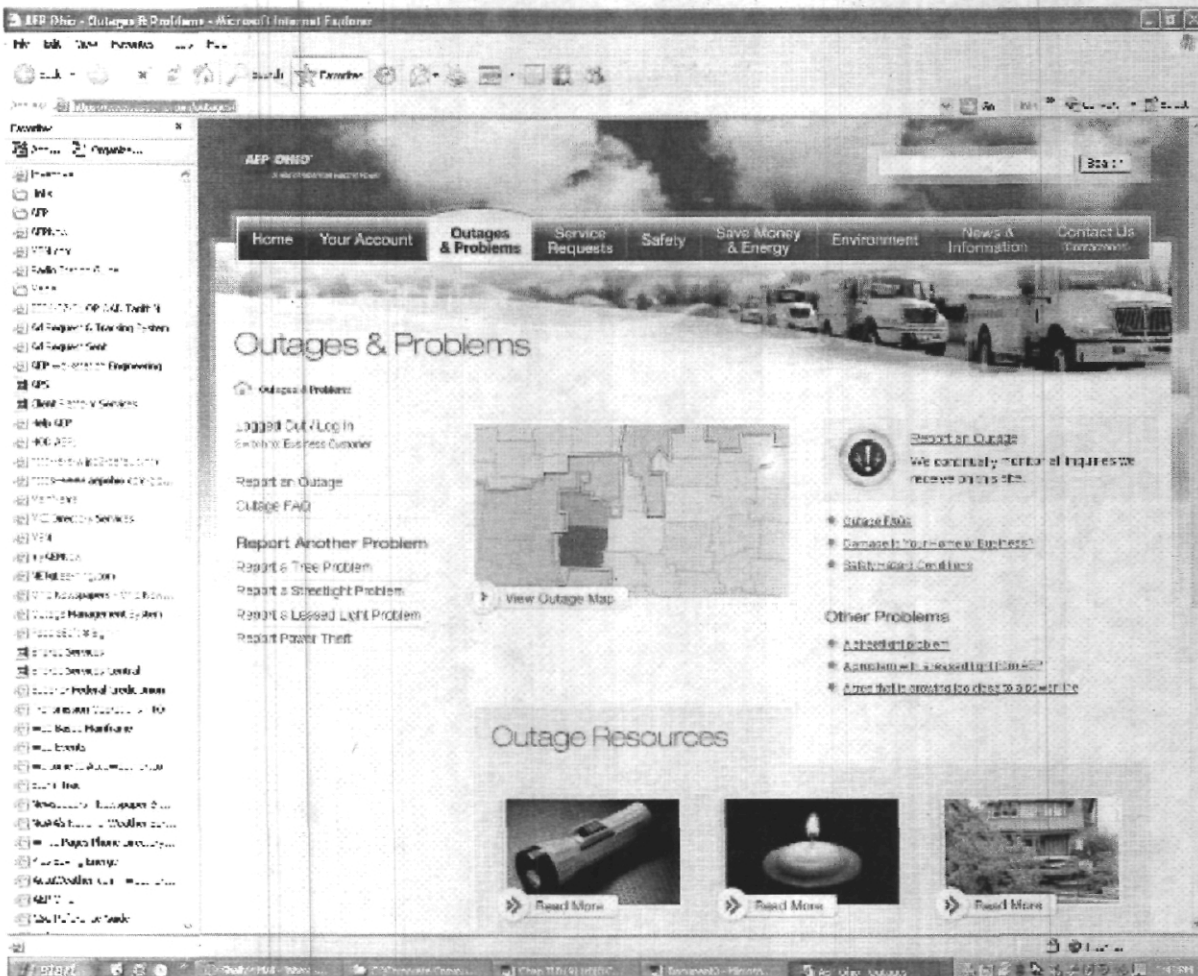


Exhibit 4B – Restoration Process Graphic



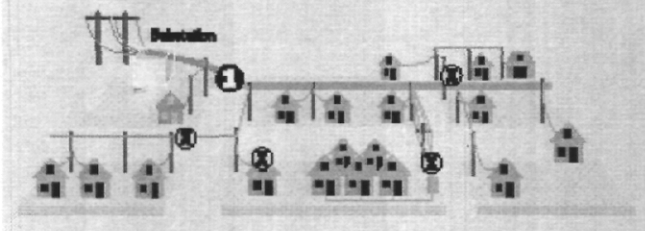
A part of American Electric Power

AEP Ohio's Distribution Restoration Process

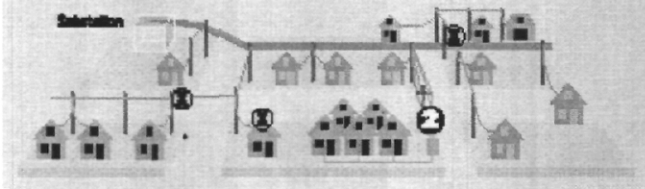
During outages, AEP Ohio works to restore power as safely and quickly as possible. In every storm restoration plan, we implement a basic process. Special priority is given to: reported hazards such as downed power lines, 911 agency calls and emergency facilities such as fire and police stations. In restoring customers' electric service, AEP Ohio works on main lines, or circuits, that will restore the largest number of customers in the shortest period of time. A main line feeds power to thousands of homes and is the source of power for secondary and service drop lines. After main lines are restored, power lines that serve smaller clusters of homes are repaired. Finally, lines that feed service drops to individual homes are repaired.

1 The distribution main line from a substation is damaged, leaving most customers served from that line without power. No other line will be restored until the main line feeding power to that line is repaired.

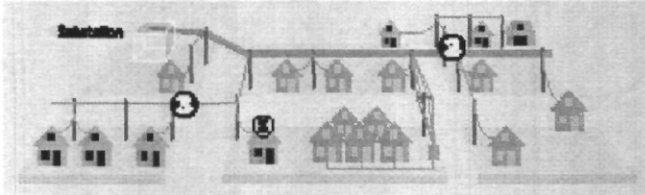
Transmission lines



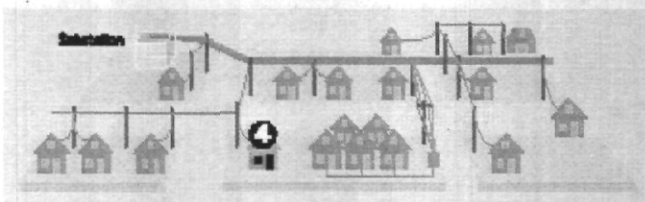
2 Once the distribution main line is restored, a distribution line crew is dispatched to the damage site affecting the next largest group of customers.



3 Smaller capacity lines that serve clusters of homes are repaired next.



4 Individual service lines are repaired only after all lines are restored. If a home or business is without power, while others around have service, additional work by an electrical contractor may be needed.



- energized power lines
- electrical distribution lines without power
- ⓧ damage or repair site

Exhibit 5A – facebook

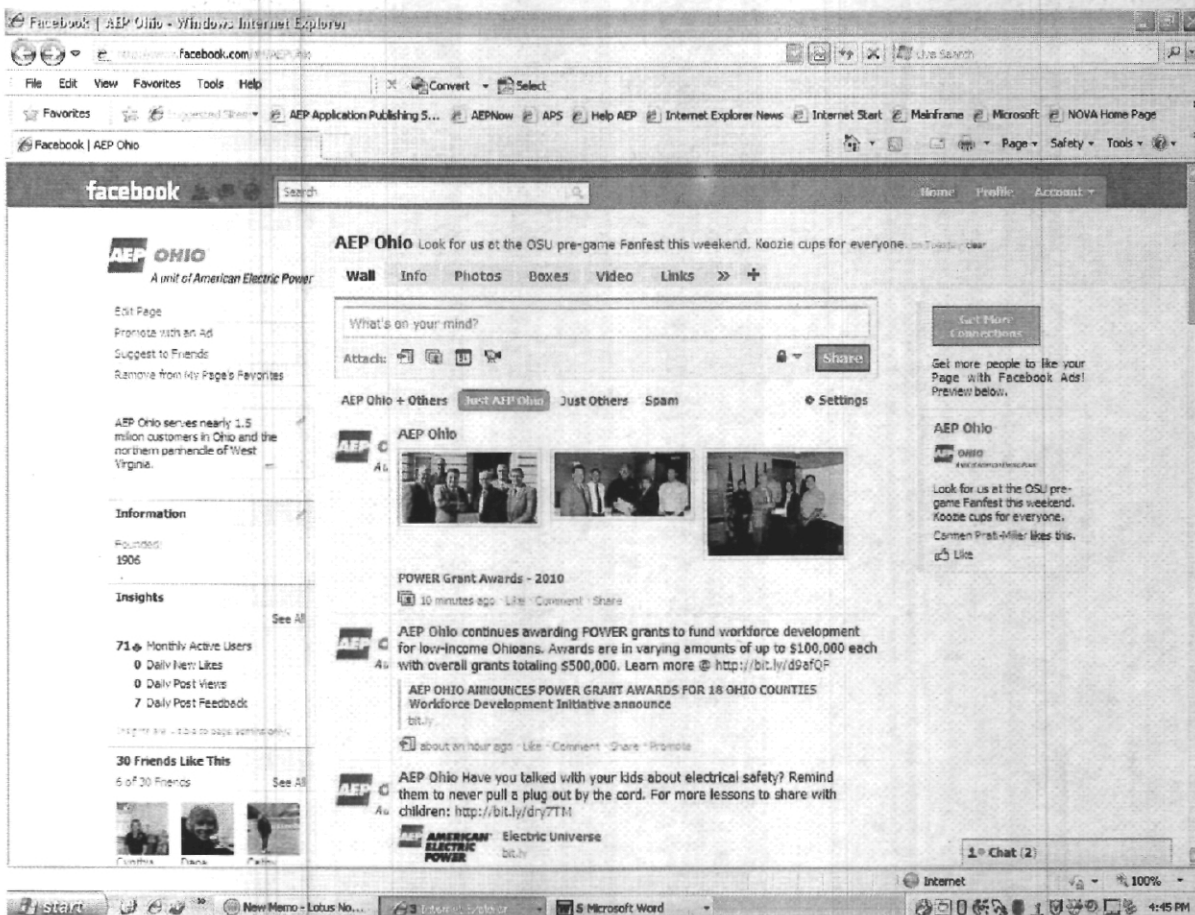


Exhibit 5B – facebook: gridSMART

Facebook | AEP Ohio Energy Savings - Windows Internet Explorer

facebook.com/.../AEP Ohio Energy Savings

File Edit View Favorites Tools Help

Facebook | AEP Ohio Energy Savings

facebook Search Home Profile Account

gridSMART
from AEP OHIO

AEP Ohio Energy Savings Most energy used by dishwashers goes to heat the water. To increase energy efficiency, wash only full loads of dishes & using the air-dry setting instead of heat-dry will also save energy. about a minute ago · clear

Wall Info Video Photos Boxes Notes +

What's on your mind?

Attach: [Icons] Share

AEP Ohio Energy Savings + Others Just AEP Ohio Energy Savings Just Others Spam Settings

gridSMART AEP Ohio Energy Savings Most energy used by dishwashers goes to heat the water. To increase energy efficiency, wash only full loads of dishes & using the air-dry setting instead of heat-dry will also save energy. about a minute ago · Like · Comment · Promote

gridSMART AEP Ohio Energy Savings Still using that old energy-hogging refrigerator? You can reduce your electric bills, help the environment & earn \$50 if you recycle it before the end of the year. For details: <http://bit.ly/cRaj0j> bit.ly Monday at 3:30pm · Like · Comment · Share · Promote

gridSMART AEP Ohio Energy Savings Upgrading your life this holiday season? A good start is to recycle an old TV, cell phone, printer and other electronics. Check out <http://Earth911.com/> to find a recycling center near you.

Earth911.com - Find Recycling Centers and Learn How To Recycle
Earth911.com
Guide to local resources including recycling centers, how to recycle, pollution prevention and how help protect the environment.

November 3 at 2:04pm · Like · Comment · Share · Promote

Chat (2)

Start AEP Ohio Social... stayconnectedP... Internet Document3 - M... HootSuite - Moz... 1:54 PM

Left Sidebar:

Edit Page
Promote with an Ad
Suggest to Friends
Remove from My Page's Favorites

AEP Ohio wants to partner with YOU to be a smart user of energy in your home or business. Learning and adopting new energy efficient behaviors saves you money, and, it helps us all be part of the solution to reduce energy consumption.

Insights See All

27 Monthly Active Users
0 Daily New Likes
0 Daily Post Views
0 Daily Post Feedback

Instagram is not a page administrator.

Right Sidebar:

Get More Connections
Get more people to like your Page with Facebook Ads! Preview below.

AEP Ohio Energy Savings
gridSMART

AEP Ohio serves nearly 1.5 million customers in Ohio and the northern peninsula of West Virginia. In Ohio, we provide power to more...
Carmen Pratt-Miller likes this.
Like

Exhibit 6A – twitter

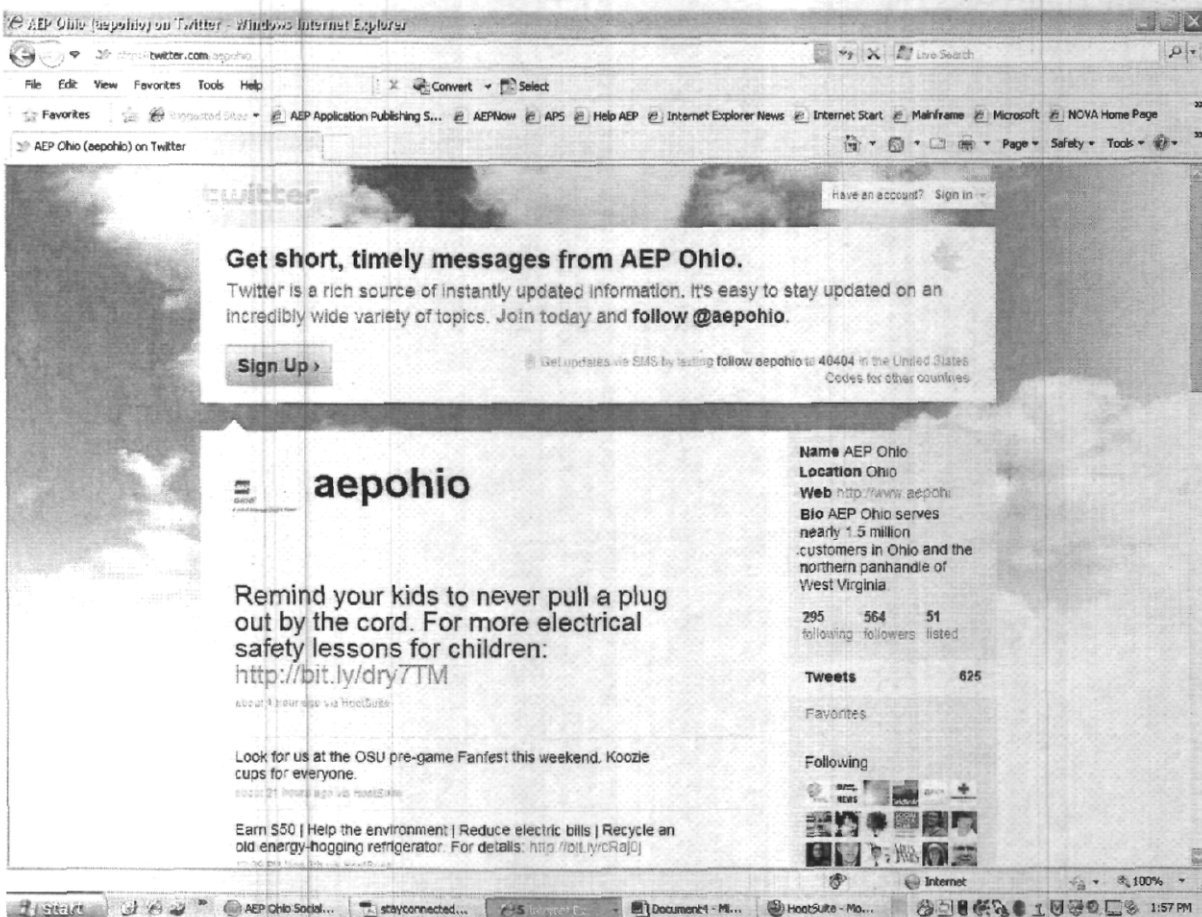


Exhibit 6B – twitter: Outages

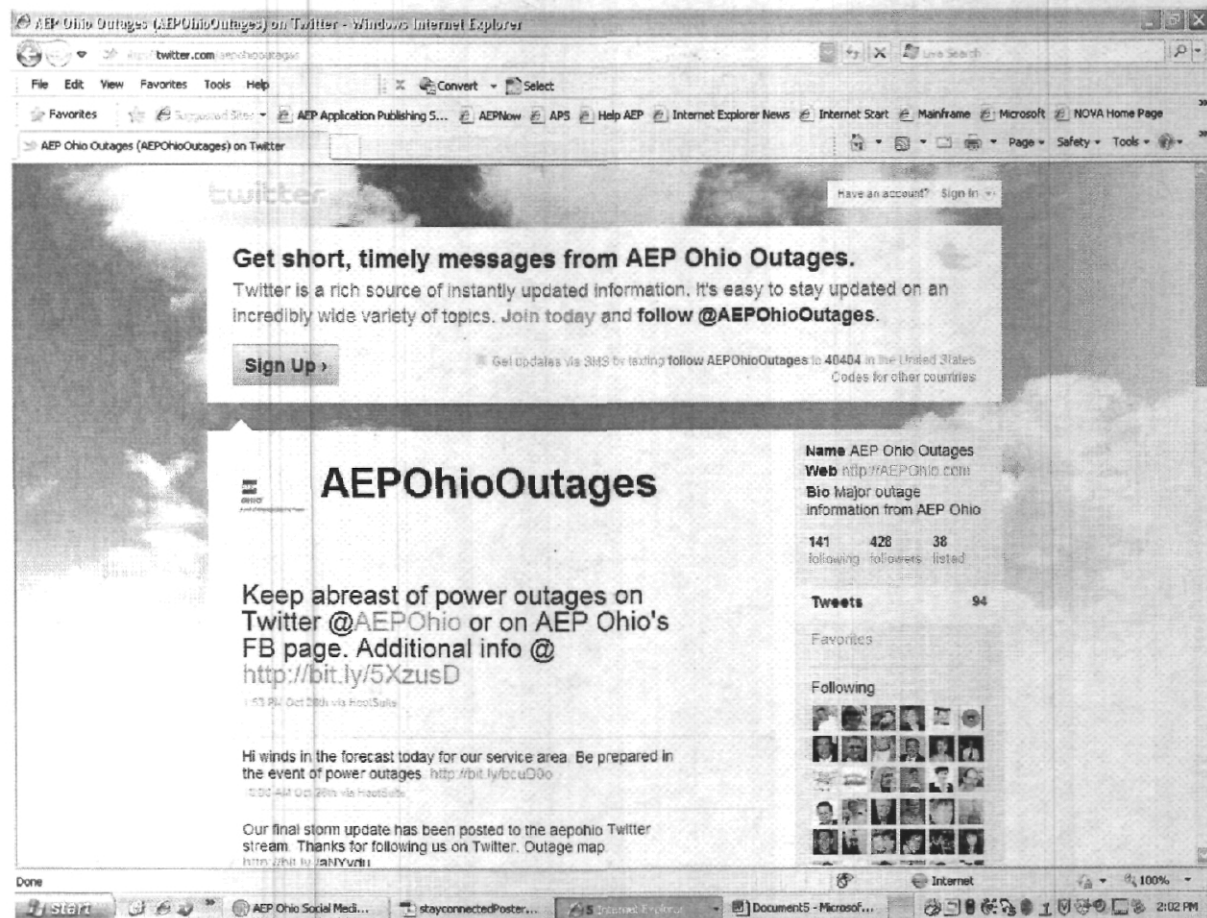


Exhibit 7 – flickr

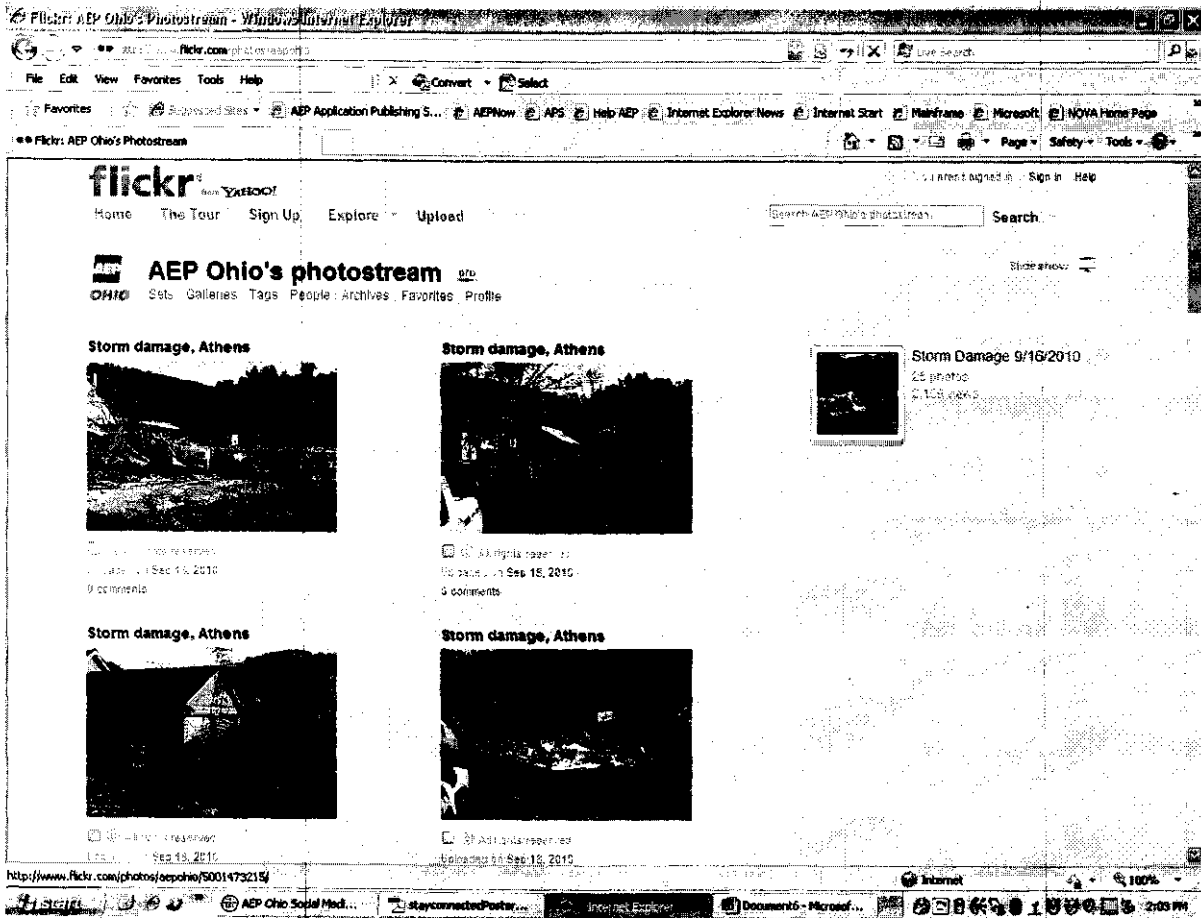


Exhibit 8A -- <https://www.aepohio.com/info/community/connections/>

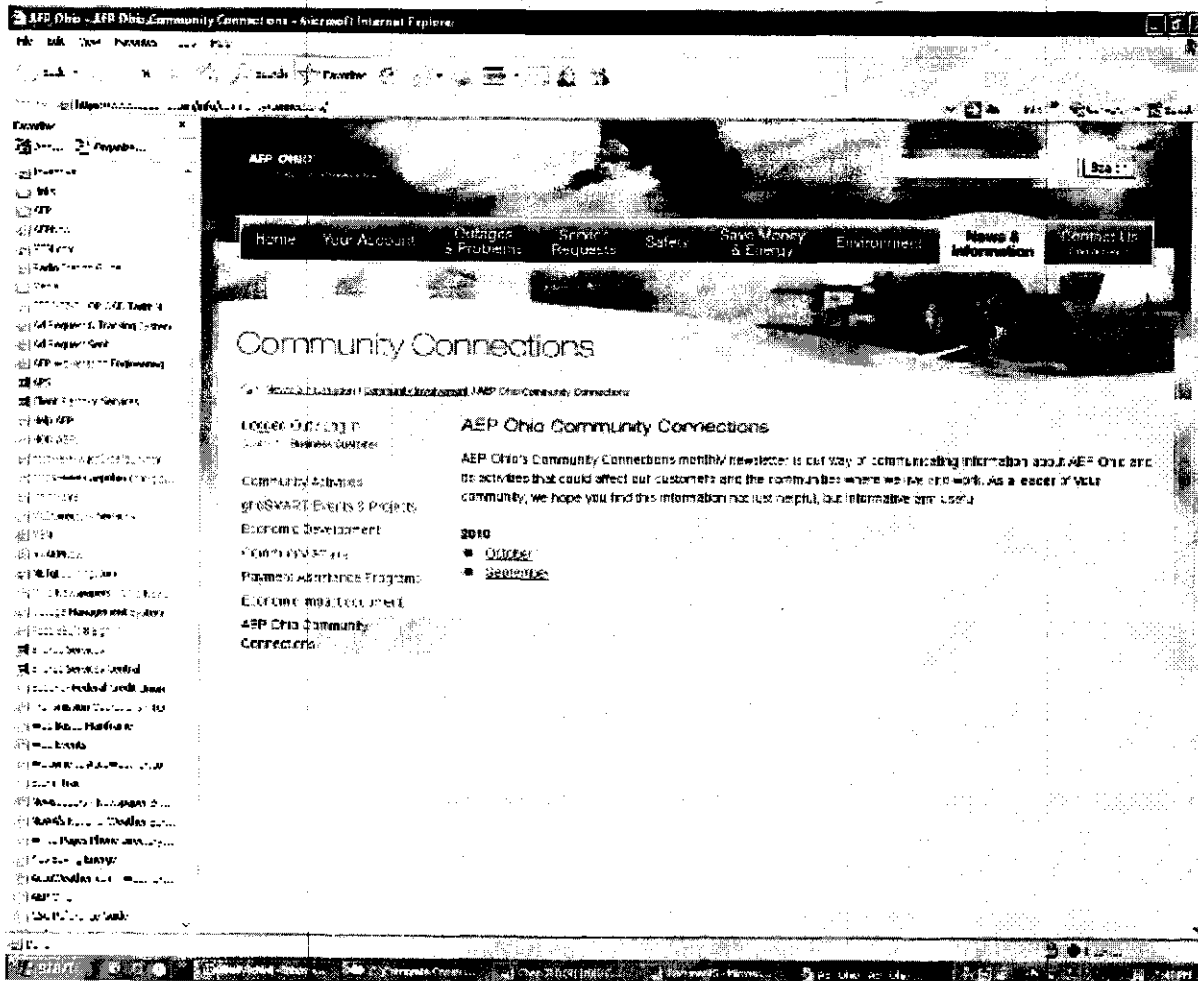
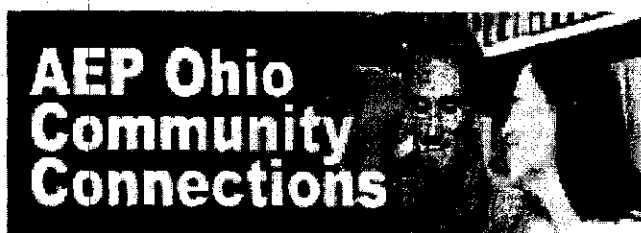


Exhibit 8B – Front Page of Newsletter



IN THIS ISSUE:

- Froehle Named Vice President - External Affairs
- Knowledge Powers AEP Ohio
- AEP Ohio Announces New Solar Energy Distribution
- Market Plans First
- PLUG Issues Reconnection Notice
- Neighbor to Neighbor Program Update
- AEP Ohio Promotes Ash Treeing Programs



Froehle Named Vice President - External Affairs

AEP Ohio recently named Thomas Froehle vice president - External Affairs. Froehle joined AEP Ohio from the law firm McNees Wallace & Nurick LLC, where he specialized in regulatory legal matters, energy legislation and governmental affairs, with emphasis on industrial energy users.

Froehle's areas of responsibility include public policy, community and governmental affairs, as well as building and maintaining external relationships with legislators, consumer groups and other AEP Ohio stakeholders. He also oversees the company's role in community involvement and corporate giving.

"I am very pleased to welcome Tom to the AEP Ohio leadership team," said Joe Hamrick, president and chief operating officer for AEP Ohio. "He brings valuable experience with complex energy and regulatory matters combined with a proven ability to craft solutions that work for multiple stakeholders."

Prior to joining McNees Wallace & Nurick, Froehle was manager of Government Affairs for the Ohio Manufacturers' Association (OMA), where he was responsible for recommending, monitoring and lobbying legislation to benefit the OMA's members. He also was General Counsel to the OMA's Board of Directors.

Froehle earned a Bachelor of Arts degree in political science from Ohio Dominican College and holds a Juris Doctor degree from Capital University Law School. He is a veteran of the United States Army and a National Service Medal Recipient for state service during Operation Desert Storm. Froehle can be reached by email at tfroehle@aep.com.



Exhibit 9 – Examples of Customer Messaging

Customer Messaging Templates

EMERGENCY OUTAGE

This is an important message from AEP Ohio about an emergency power outage tonight.

The outage will take place from approximately midnight to 3 a.m. and is necessary to allow crews to safely make emergency repairs after a tree fell on the line.

We appreciate your patience and understanding as we work make these repairs. If you have questions about this message, please call our 24-hour customer solutions center at 1-800-277-2177. Again, that's 1-800-277-2177.

Thank you.

OUTAGE EXPLANATION

This is an important message from AEP Ohio about your electric service.

The extended outage that affected your area Tuesday evening happened when private tree trimmers cut down a 70-foot tall tree. The tree fell on the lines, breaking the conductor and interrupting electric service to your area.

AEP Ohio appreciated your patience as we worked to repair the lines and restore your power. If you have questions about this message, please call our 24-hour customer solutions center at 1-800-672-2231. Again, that's 1-800-672-2231.

Thank you.

RELIABILITY

This message from AEP Ohio is to let you know that beginning the week of April 2 we will resume the cable improvement work that began in spring 2006 in the Muirfield Village area.

AEP Ohio has engaged New River Electrical as its contractor to continue this work, which is part of our continuing efforts to improve the reliability of your electric service.

While we do not anticipate the need to interrupt your electric service when crews reach your neighborhood, unexpected situations may require an outage to allow crews to do their work safely.

During the cable revitalization process, crews also may determine that some cable will need to be replaced. Cable replacement will require digging, trenching or boring, which will be done as needed and as provided for in the electric utility easements.

We at AEP Ohio appreciate your patience and understanding as we work to improve your electric service. If you have questions, please contact our 24-hour customer solutions center at 1-800-277-2177. Again, that's 1-800-277-2177.

Thank you.

COPPER THEFT – emergency outage notification

This is an important message from AEP Ohio about copper thefts from the substation that feeds power to your home or business and an emergency power outage that is needed to repair damaged station equipment.

The copper theft makes it necessary for AEP Ohio to interrupt your electric service to allow crews to safely make emergency repairs.

Stealing copper from substations and power lines is illegal. It can result in serious injury or death to the public, AEP Ohio employees and the thieves themselves.

AEP Ohio asks you to report any suspicious activity around AEP Ohio facilities and equipment.

AEP Ohio offers a \$5,000 reward for information leading to an arrest and successful conviction of copper thieves.

If you have information that would aid in the prosecution of these cases, please call AEP's security hotline at 1-866-747-5845 or 911 for your local law enforcement. Again that number is 1-866-747-5845 or 911 for your local law enforcement.

Thank you.

TREE CLEARANCE

This is an important message from AEP Ohio about tree clearance work that will be done along the circuit that feeds power to your home or business beginning next week.

Again this is an important message from AEP Ohio about tree clearance work that will be done along the circuit that feeds power to your home or business beginning next week.

Clearing trees, limbs and brush from around electric facilities is a necessary part of AEP Ohio's continual efforts to provide safe, reliable electric service to its customers.

AEP Ohio does not anticipate the need to interrupt your electric service when crews reach your neighborhood; however, unexpected situations may require an outage to allow crews to do their work safely.

We at AEP Ohio appreciate your patience as we work to improve the reliability of your electric service. If you have questions about this message, please call our 24-hour Customer Solutions Center at 1-800-277-2177. Again, that's 1-800-277-2177.

Thank you.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (d) (ii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications

SFR Reference
(B)(9)(d)(ii) Credit and Collections

I. Policy and Goal Setting

AEP Ohio Corporate Communications Department does not issue credit and collections policy statements but supports the policies and objectives of the credit and collections group through its directives, procedures and practices from a communications and promotions perspective.

II. Strategic and Long-Range Planning

AEP Ohio Corporate Communications Department does not make decisions regarding credit and collections strategic and long-range planning; however, communications staff works in conjunction with the credit and collections group to support and implement their decisions from a communications perspective.

III. Organization Structure

Not applicable.

IV. Decision-Making

AEP Ohio Corporate Communications Department does not make decisions regarding credit and collections; however, communications staff works in conjunction with the credit and collections group to support and implement their decisions from a communications perspective.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

AEP Ohio Corporate Communications Department does not have a role in credit and collections controlling processes.

VII. Internal and External Communications

AEP Ohio Corporate Communications Department sets goals and determines best practices and strategies annually for promoting and communicating the needs of the business units the group supports, including credit and collections. These include communications regarding bill pay assistance, energy savings, incentive programs, budget plans, special promotions and other credit and collections related matters.

Corporate Communications uses a variety of media to provide external and internal communications regarding credit and collections, including:

- AEP and AEP Ohio external websites;
- social media networks, including Facebook and Twitter;
- news media relations, such as inquiries, press releases and advertising;
- direct mail pieces;
- internal intranet websites for employee communications; and
- internal communications directed at employees such as talking points, fact sheets; webcasts and face-to-face meeting.

AEP Ohio Corporate Communications provides ongoing direct guidance and communications for individual circumstances, events and issues when required, such as to address customer complaints regarding billing or other concerns.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (ii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Meter Revenue Operations

SFR Reference
(B)(9)(d)(ii) Credit and Collections

I. Policy and Goal Setting

The credit and collections section of the AEP Ohio Meter Revenue Operations Department is responsible for collecting delinquent bills from customers.

The manager of Ohio Meter Revenue Operations, in collaboration with AEP Ohio executive leadership, Meter Revenue Operations staff, AEP Service Corporation functional leadership, AEP Credit Policy and Payment Administration and AEP Regulatory / Rates, is responsible for recommending and implementing management policies for the credit and collections section of AEP Ohio's Meter Revenue Operations Department.

Policies related to credit and collections are developed with input from AEP Credit Policy and Payment Administration, AEP Regulatory / Rates, the AEP Safety Manual and Meter Revenue Operations Safety Council and Meter Revenue Operations staff.

Criteria used in the development of these policies include employee safety; the obligations spelled out in the Ohio Administrative Code; the requirements set forth in the AEP Credit Policy Manual and the AEP Records Retention Policy; and Meter Revenue Operations departmental needs, including but not limited to staffing levels and productivity.

II. Strategic and Long-Range Planning

Planning within the Meter Revenue Operations department reflects AEP Ohio's long-term strategies to work safely, to properly plan for orderly management succession, to adapt quickly to changes in the legislative and economic environment in which AEP Ohio operates and to contribute to the financial stability of American Electric Power by reducing the amount of money charged off.

The Meter Revenue Operations Department's strategic and long-term planning process is done in cooperation with other relevant departments including Credit Policy and Payment Administration, regulatory and rates, safety, customer services and the customer solutions centers.

Financial, operational and administrative planning processes include developing a formal budget against which actual costs are compared and monitored, evaluating human resource needs, and projecting equipment and facilities needs.

III. Organization Structure

The manager of AEP Ohio Meter Revenue Operations reports to the AEP Ohio vice president of Distribution Region Operations, who in turn reports to the president and chief operating officer of AEP Ohio.

The department is organized into geographic regions, subdivided into area offices as follows:

- Central Ohio (including Zanesville, Coshocton, Lancaster, Newark and Mount Vernon);
- Columbus and Delaware;
- Northeastern Ohio (including Canton, New Philadelphia and Wooster)
- Ohio Valley (including Steubenville, East Liverpool, Belmont County and Cambridge);
- Southern Ohio - Athens (including Marietta, Athens, Wellston, Gallipolis, McConnelsville, Crooksville and Pomeroy);
- Southern Ohio - Chillicothe (including Chillicothe, Circleville, Hillsboro, Seaman, Portsmouth, Ironton and Chesapeake)
- Western Ohio (including Tiffin, Fremont, Fostoria, Bucyrus, Willard, Lima, Van Wert, Paulding, Findlay and Kenton);

Department employees include supervisors, support personnel including dispatchers and administrative associates; meter electricians, field meter specialists, field meter servicers and meter readers.

IV. Decision-Making

Decision making is accomplished collaboratively among Meter Revenue Operations Department managers and supervisors, in conjunction with Credit Policy and Payment Administration, Customer Solutions Centers, regulatory and customer services.

The criteria for decisions are safety, legislative requirements (OAC) and financial impact, as well as projected organizational effects on Meter Revenue Operations and other departments such as Billing and Account Operations, Customer Solutions Centers and customer services.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the

Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The execution of various functions and objectives are monitored and evaluated continuously by supervisors and management both within the department and throughout AEP Ohio and AEPSC. This includes reviewing employee safety, department financial performance, workforce productivity and conformance to the Electric Service and Safety Standards, as well as performance against numerous internal goals and objectives, including but not limited to:

- number of personal injuries and preventable vehicle accidents;
- dollar value of charge-offs;
- cost per worked order;
- percentage of delinquency vs. revenue;
- percentage of meter connects completed in three days vs. number available to be worked; and
- hours of overtime worked.

VII. Internal and External Communications

Internal communications are accomplished through a variety of media – face-to-face and telephone conversations, meetings and emails (both individual and group). Outside the Meter Revenue Operations group, but inside AEP, communications are handled in a similar manner to provide for a timely flow of information in both directions.

Whenever possible, formal written procedures and policies are used to convey information to personnel in the Meter Revenue Operations Department. These policies include the AEP Safety Manual, the AEP Credit and Collections Policy and numerous other procedures that supplement these policies.

External communications from the Meter Revenue Department include e-mail, postal mail and telephonic communications with vendors and customers. In addition, customers are contacted via postal mail, telephone and door hanger notices.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Communications and Public Affairs

Corporate Communications

SFR Reference

(B)(9)(d)(iii) Customer Conservation Programs

I. Policy and Goal Setting

The objective for the AEP Ohio Corporate Communications group related to customer conservation programs is to provide marketing communications support and direction for implementing these programs. This objective includes the preparation, editing, production and distribution of written and electronic communication and marketing materials. A variety of channels are used to educate customers about the energy efficiency programs offered by the company and to encourage load management and off-peak energy uses through programs designed to get residential and business customers to use less energy and save money.

Policies are established in recognition and support of overall AEP corporate policies geared toward enhancing effective and efficient communication procedures. This includes providing timely, accurate and relevant information to internal and external customers in addition to informing employees about the company's strategy, policies, objectives, operations and activities relative to customer conservation programs.

Goals and accomplishments for the programs are reviewed regularly and plans are updated annually.

II. Strategic and Long-Range Planning

Strategic planning includes an ongoing identification effort to identify opportunities to promote and advertise the customer conservation programs using a variety of print and electronic media. This approach helps to diversify the distribution of news and information related to the individual programs. Departmental strategic planning involves identifying issues related to the individual programs and identifying customer, general public and employee information needs as well as determining the most cost-effective methods to produce and distribute the information. Economic indicators and budget requirements are major factors in the planning process.

III. Organization Structure

AEP Ohio Corporate Communications is managed by the director – Communications, who reports directly to AEP Ohio president and chief operating officer. The AEP Ohio Communications Department is comprised of the director, six communications consultants and a communications associate.

The group has general responsibility for internal and external communications, advertising and media relations for all AEP Ohio organizations. The group also provides communications services to AEP Transmission and Generation organizations within AEP Ohio's service territory. Other areas of responsibility include Energy Efficiency and Peak Demand Response as well as the gridSMART Project.

IV. Decision-Making

The corporate communications team makes decisions by working through the concerns involved in a particular issue and using all available resources. Due to the diversity of information provided to the company's various audiences, the decision-making process can involve consultation among the communications director, the communication consultants and representatives of other departments, including AEP Ohio president and chief operating officer.

For the customer conservation programs the corporate communications group also consults with the manager of Energy Efficiency and Consumer Programs and his staff, as well as the program providers.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Several research tools are used to determine the effectiveness of communications for the customer conservation programs, as well as for measuring achievement of company energy conservation goals. They include customer satisfaction surveys, website comments and feedback, comments made on social media (facebook, twitter, flickr), evaluations of public presentation and media tracking. Each customer conservation program has specific annual goals set by the manager of energy efficiency and peak

demand response to meet the overall goal of energy savings outlined in Senate Bill 221. The goals for each program are reviewed regularly, and the marketing programs are adjusted appropriately to help insure the programs succeed at reducing customer energy consumption. Use of specific demographics to market the individual programs targets customers most likely to participate in the programs as they become available.

VII. Internal and External Communications

Corporate Communications works with employees and customers to promote customer conservation programs. The communications program is designed to provide a convenient method for the company's stakeholders to gain additional knowledge about the company's programs, as well as encourage stakeholders to participate to save money and energy. The communication's team works closely with news media and customer contact personnel to provide pertinent information and to increase public awareness and understanding of the programs available to both residential and business customers, while also encouraging participation in those programs.

Internal

The Corporate Communications Department provides a variety of internal communication materials, primarily distributed electronically. The internal company website – AEP Ohio Now blog – is published once a week and distributed to AEP and AEP Ohio employees who work within the Ohio service territory. The blog features summaries of news and events about conservation programs available to employees and announces new programs as they are added. Other communications venues include webcasts, departmental newsletters, direct email/emails, webinars, staff meetings, executive field visits, special employee promotion events and call center employee communications.

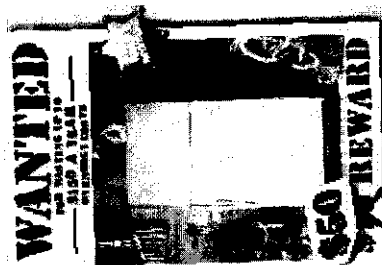
External

Corporate Communications external efforts are geared toward multiple venues and mass communications. To support energy use and conservation programs, communication staff reaches external audiences via direct email correspondence with customers who have provided email addresses to AEP Ohio, bill inserts/messages (Exhibit 1), direct mail pieces, advertising, press releases/media advisories (Exhibit 2), external website (Exhibit 3), social media, electronic advertising, television advertising (Exhibit 4) and printed advertising (Exhibit 5, 5a) pieces. The communications team maintains and updates the company websites, www.aepohio.com (see Exhibit 6) and gridsmartohio.com (see exhibit 3), ensuring the availability of timely and accurate information regarding the latest energy efficiency programs available to both business and residential customers. These websites are the primary locations for information regarding all of AEP Ohio's customer conservation programs. Social media also is used for energy efficiency messaging (see Exhibit 7 and 8).

AEP Ohio Community Connections (Exhibit 9) is a monthly electronic newsletter distributed to thought leaders within the Ohio service territory. It provides a feedback loop for timely exchange of information regarding EE/PDR programs. Communications team members help organize and staff special events such as county fairs, home shows and the parade of homes to promote energy conservation programs. In addition, the company's "Home Energy Savings Tour" (exhibit 8) has traveled extensively throughout Ohio, providing a hands-on interactive demonstration of individual programs available to customers. The exhibit is staffed by AEP Ohio personnel and members of AEP Ohio's marketing partner.

The "Sparkling Your Interest" speaker's bureau is an external outreach effort designed to educate and inform customers, community leaders and other stakeholders about significant issues and events affecting the company and its customers. Program topics include energy efficiency education.

Exhibit 1 – Bill Insert / Message



CRIME: Stealing energy coating innocent homeowners hundreds of dollars.

DESCRIPTION: 10+ yrs old*, medium build, flat top, 5-6 feet tall, no prior arrests. Last seen running in a neighborhood just like yours.

IF SPOTTED: AEP Ohio customers should call 1-877-845-4112 or visit gridSMARTOhio.com. We'll pick it up and recycle it for FREE and you'll pick up a \$50 reward.

IF SPOTTED: AEP Ohio customers should call 1-877-845-4112 or visit gridSMARTOhio.com. We'll pick it up and recycle it for FREE and you'll pick up a \$50 reward.



Exhibit 2 – News Release



NEWS from AEP Ohio

MEDIA CONTACT:

Shelly Haugh
Corporate Communications Consultant
888-930-6446

FOR IMMEDIATE RELEASE

**AEP OHIO ANNOUNCES DOUBLE APPLIANCE
RECYCLING INCENTIVE FOR MAY**

Customers that recycle an older refrigerator or freezer in May receive \$50 rebate

GAHANNA, Ohio, April 29, 2010 – AEP Ohio customers can get a jump start on spring cleaning by having their older extra refrigerator or freezer removed for free during May while earning double the normal \$25 rebate. Through the company's Appliance Recycling Program, AEP Ohio customers who recycle either a refrigerator or freezer in May will receive a \$50 rebate instead of the normal \$25 incentive.

"A lot of people spring clean their homes in May. This program gives them a quick way to get a head start on creating more space in the garage or basement, and make \$50. They'll also see significant cost savings because older refrigerators and freezers consume much more power than newer models," said Karen Sloneker, AEP Ohio Director – Customer Service and Marketing. "However, the \$50 offer is for May only, so it's important to act now."

Sloneker said that many people continue to use their older refrigerators for storage after they buy a new one. Those older appliances can account for approximately 15 percent of the average AEP Ohio customer's electric use. Refrigerators and freezers manufactured before 1990 can use as much as 1,500 kilowatt hours (kWh) a year. Retiring a second refrigerator or freezer could result in savings of up to \$150 on energy costs annually.

Customers can participate in the Appliance Recycling Program by calling 1-877-545-4112 or visiting gridSMARTohio.com to schedule a free pickup. Refrigerators or freezers must be at least 10 cubic feet in size and operational at the time of pickup.

The old units are sent to an appliance recycling facility operated by JACO Environmental, a leading, national provider of appliance recycling services. JACO's process includes the recycling of nearly 95 percent of each refrigerator including metals, plastic, oils and the foam insulation.

"Besides consuming three to four times the energy of newer, more efficient refrigerators, old refrigerators contain a toxic brew that includes mercury, oil and ozone-eating CFCs from foam insulation. As a result, old refrigerators pose a significant threat to the environment when improperly discarded," said Michael

-more-

Dunham, JACO's Director of Energy and Environmental Programs. "This new program helps save energy and the planet."

The AEP Ohio refrigerator recycling program is one of several energy efficiency programs offered by the utility to help residential and commercial electric customers use less energy, manage their bills and protect the environment. Although the program will remain available to AEP Ohio customers in 2010, the program's incentive will return to \$25 starting June 1.

For more information about AEP Ohio's energy efficiency programs, visit gridSMARTohio.com.

AEP Ohio provides electricity to nearly 1.5 million customers of major AEP subsidiaries Columbus Southern Power Company and Ohio Power Company in Ohio, and Wheeling Power Company in the northern panhandle of West Virginia. AEP Ohio is based in Gahanna, Ohio, and is a unit of American Electric Power.

American Electric Power is one of the largest electric utilities in the United States, delivering electricity to more than 5 million customers in 11 states. AEP ranks among the nation's largest generators of electricity, owning nearly 38,000 megawatts of generating capacity in the U.S. AEP also owns the nation's largest electricity transmission system, a nearly 39,000-mile network that includes more 765 kilovolt extra-high voltage transmission lines than all other U.S. transmission systems combined. AEP's transmission system directly or indirectly serves about 10 percent of the electricity demand in the Eastern Interconnection, the interconnected transmission system that covers 38 eastern and central U.S. states and eastern Canada, and approximately 11 percent of the electricity demand in ERCOT, the transmission system that covers much of Texas. AEP's utility units operate as AEP Ohio, AEP Texas, Appalachian Power (in Virginia and West Virginia), AEP Appalachian Power (in Tennessee), Indiana Michigan Power, Kentucky Power, Public Service Company of Oklahoma, and Southwestern Electric Power Company (in Arkansas, Louisiana and east and north Texas). AEP's headquarters are in Columbus, Ohio. News releases and other information about AEP can be found at www.aep.com.

Exhibit 3 – External Website gridSMARTOhio.com

gridSMART
A Division of **OHIO**

Home **Business Energy Efficiency** **Savings Incentives Programs** **Renewables Alternative Energy** **Demo Project New Technology** **Community Events & Projects**

Need assistance with your business' energy efficiency upgrade?
A Solution Provider can help.

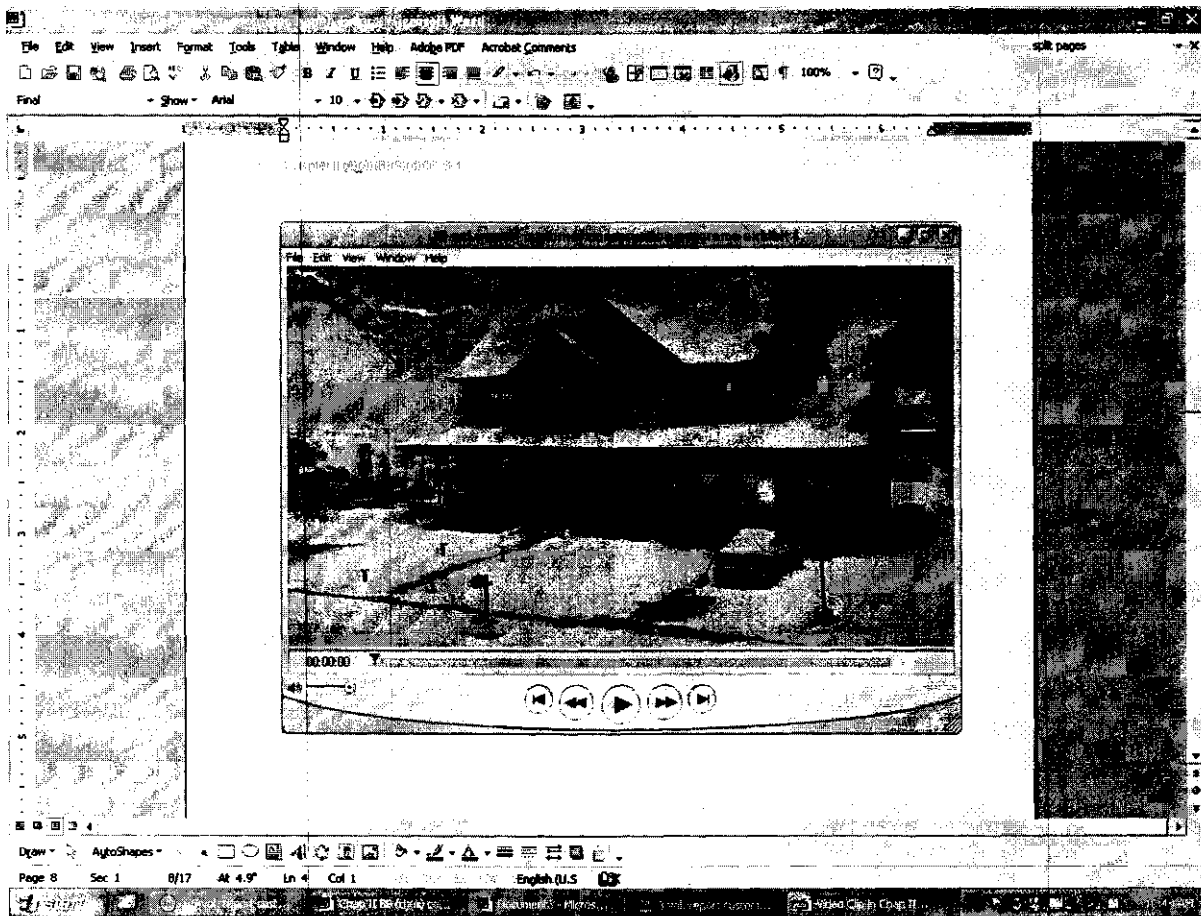
Holiday Lights
Save 90% on LEDs
LED holiday lights use 90% less energy than incandescents – [Buy yours at a discount today.](#)

Smart Meters Interactive Exhibit
Check out our customized mobile as it travels to [community events](#) in northeast Central Ohio

Custom Program Business Incentives
Earn incentives for your business's [custom energy efficiency projects](#)

Appliance Recycling Program
Now through the end of the year, [turn in your second refrigerator or freezer](#) and get double the normal \$25 rebate for a \$50 total rebate

Exhibit 4 – Energy Savings Tips Television Ad




Ads, such as the example shown above, appeared regularly on various cable television networks throughout AEP Ohio's service territory.



Exhibit 5a - Print Ad

WANTED

FOR WASTING UP TO
\$150 A YEAR
ON ENERGY COSTS



\$25 REWARD

CRIME: Stealing energy, costing innocent homeowners hundreds of dollars.

DESCRIPTION: 10+ yrs old, * medium build, flat top, 5-6 feet tall, no prior arrests. Last seen running in a neighborhood just like yours.

IF SPOTTED: AEP Ohio customers should call 1-877-546-4112 or visit gridSMARTohio.com. We'll pick it up and recycle it for FREE and you'll pick up a \$25 reward.

gridSMART
an AEP service

*Eligible restrictions: Refrigerators and freezers must be in working condition and must be a minimum of 10 cubic feet in size, utilizing inside measurements. AEP Ohio contracts with JACO Environmental, an appliance recycler, to pick up and recycle refrigerators and freezers. AEP Ohio customers must own the unit(s) being recycled. Limit two units per residential address. A check will be mailed within 4-6 weeks after the appliance collection. Some restrictions apply.

Exhibit 5b – Print Ad

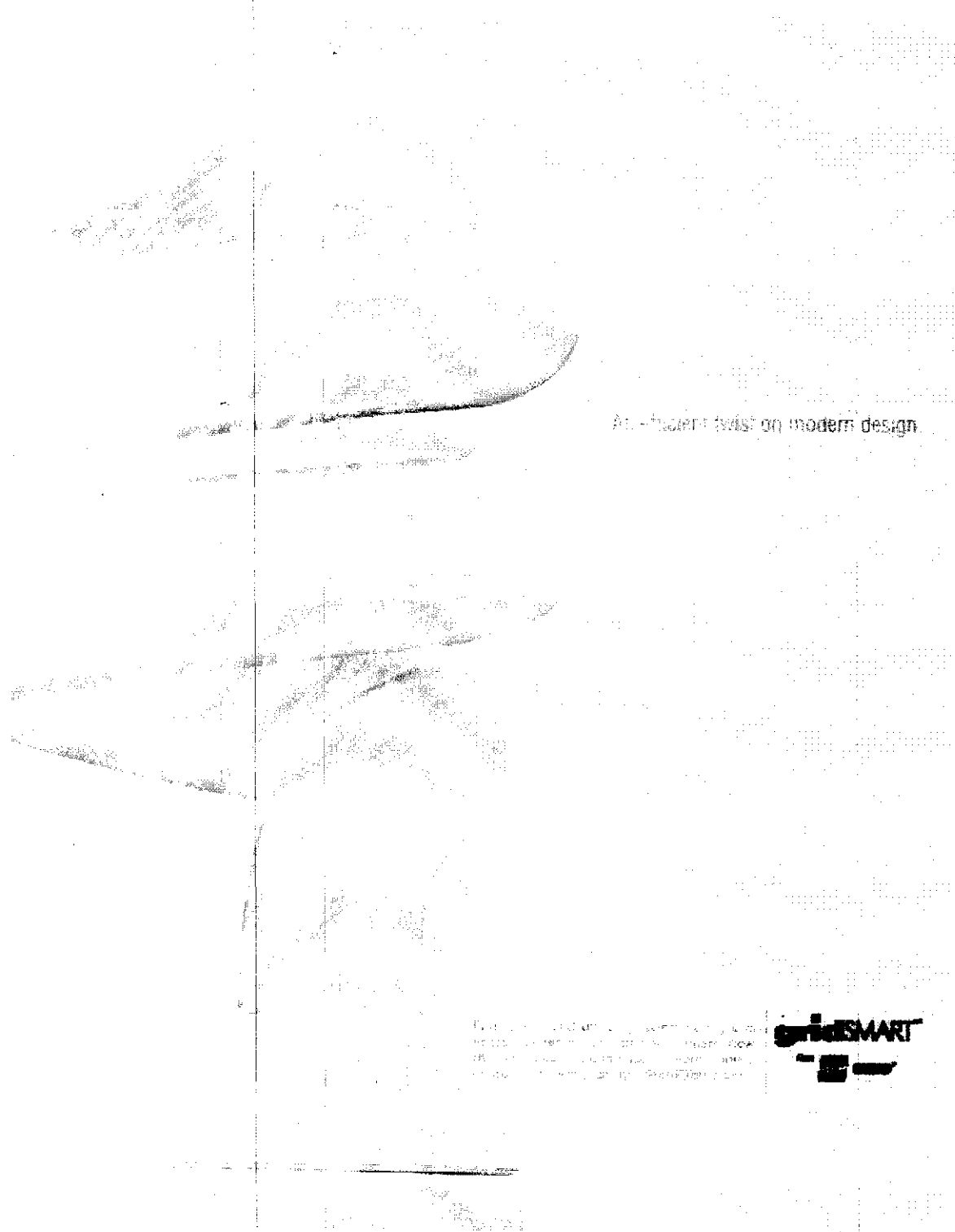


Exhibit 6 – External Website AEPOhio.com

AEP OHIO
A utility of American Electric Power

Search

Home | Your Account | Outages & Problems | Service Requests | Safety | Save Money & Energy | Environment | News & Information | Contact Us

Login

User ID: [Forgot User ID?](#)

Password: [Forgot Password?](#)

☐ Remember my User ID

[New User? Register now!](#) [Learn more](#)

Save Money & Energy

High bills? AEP Ohio offers many tips to help our customers reduce energy usage and keep costs down

- [Energy Saving Tips](#)
- [Energy Calculators](#)
- [Compact Fluorescent Lights \(CFLs\)](#)

Outages & Problems

Report Outages & Problems

Please Select

- [Map of Current Outages](#)
- [Outage FAQs](#)
- [Outage Safety Tips](#)

Your Account

- [Pay Your Bill](#)
- [Paperless Billing](#)
- [View Bills](#)
- [Your Energy Usage](#)
- [Moving? Start / Stop / Transfer Service](#)
- [Manage Account Information](#)
- [Payment Assistance](#)
- [Level Your Payments](#)

Exhibit 7- Social Media: facebook Customer Conservation Programs

facebook

Search

AEP OHIO
A unit of American Electric Power

Suggest to Friends

AEP Ohio serves nearly 1.5 million customers in Ohio and the northern panhandle of West Virginia.

Information

Founded:
1906

2 Friends Like This

Shelly Haugh

Terri Paulsen

212 People Like This

Tim Wells

Karon Rex

Patrick Colborn

AEP Ohio Like

Wall Info Photos Boxes Video Links

AEP Ohio + Others Just AEP Ohio Just Others

AEP Ohio It's Michigan Week! Our donation to the Neighbor to Neighbor energy assistance program hits \$8K with 2 OSU field goals in win over Iowa
http://bit.ly/9OuKSm

Neighbor to Neighbor Participating Agencies

NEIGHBOR TO NEIGHBOR

AEP Ohio - Ohio Neighbor To Neighbor Fund

bit.ly/
AEP Ohio and Dover Energy Fund have teamed up to create a new program that will assist low-income AEP Ohio customers who have difficulty paying their electric bill.

about an hour ago Share

2 people like this.

Brian Distelzweig Screw the Blue! Prediction: Michigan 6, OSU 48 Go Bucks!!

about an hour ago Flag

AEP Ohio contributed matching funds for every dollar donated today during the Akron-Canton Regional Foodbank radiothon! Our contribution of \$43,765 will provide funding to serve 131,295 meals over this holiday season. Thanks everyone for helping us feed the needy in N-E Ohio!

Friday at 6:00pm

2 people like this.

AEP Ohio Thanks to everyone who donated to the Akron-Canton Regional Foodbank radiothon today. It's been a very successful event. Thousands of

Exhibit 8 – Social Media: twitter Customer Conservation Programs

Have an account? [Sign in](#)

Get short, timely messages from AEP Ohio.
Twitter is a rich source of instantly updated information. It's easy to stay updated on an incredibly wide variety of topics. Join today and **follow @aepohio**.

[Sign Up](#)

Get an idea how easy it is to follow **Follow aepohio** to 40484 in the United States. Codes for other countries:

aepohio

Name AEP Ohio
Location Ohio
Web <http://www.aepohio.com>
Bio AEP Ohio serves nearly 1.5 million customers in Ohio and the northern panhandle of West Virginia.

296 following 582 followers 55 listed

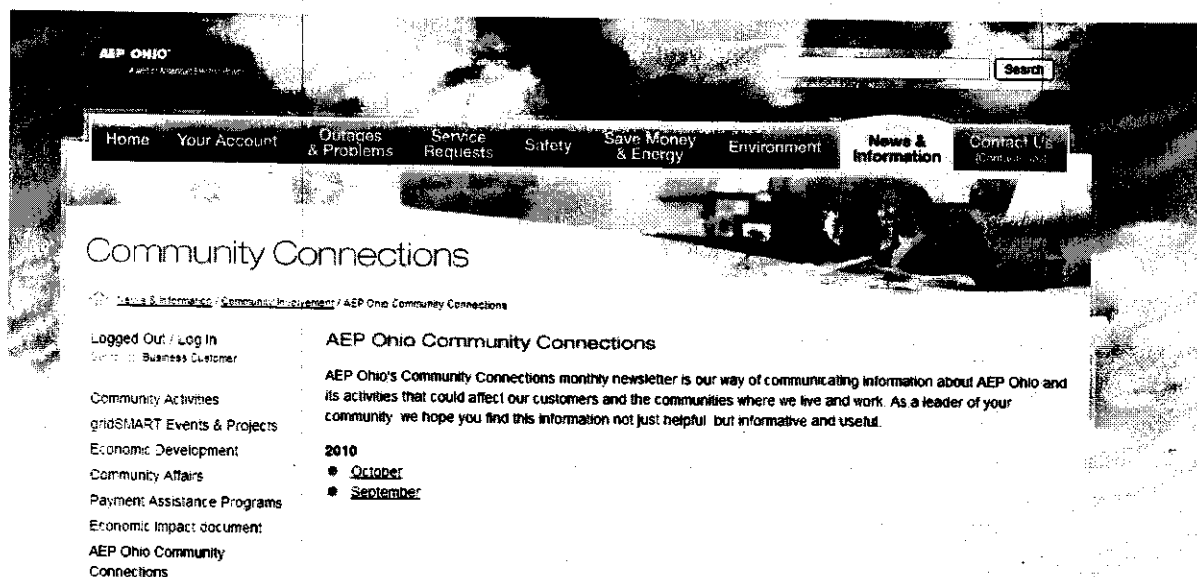
Tweets 338

Following

@milenthal That sure is a lot of meals & they will all be served by the end of this holiday season. Thanks for the retweet.

It's Michigan Week! Our donation to Neighbor to Neighbor assistance program hits \$8K with 2 rgs in win over Iowa

Exhibit 9 – Thought Leader Newsletter



American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Conservation/Demand-Side Management/Integrated Resource Planning
Energy Efficiency/ Peak Demand Response (EE/PDR) Department

SFR Reference

(B)(9)(d)(iii) Customer Conservation Programs

Information regarding customer conservation programs also is included in section (i) (ii, iii and v) conservation/demand-side management/integrated resources.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (d) (iv)
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Communications and Public Affairs

Corporate Communications

SFR Reference
(B)(9)(d)(iv) Marketing

I. Policy and Goal Setting

The overall objectives of external marketing efforts with the public are to gain for AEP Ohio the understanding, support and good will of the public it serves. The marketing program is just one way to obtain this goal. Marketing programs are used to educate customers about energy efficiency programs and encourage load management and off-peak energy uses, communicate the company's position on specific issues of concern to the company or industry, news of specific issue developments and events as they occur, safety issues such as copper theft and emphasize the value of electricity in today's world.

Another goal of AEP Ohio's marketing efforts is to build a trusting relationship with external customers. Marketing efforts shape and drive opinions of thought leaders and community leaders, making them useful as external resources. Third-party validation of a decision the utility has made is a valuable resource because it puts the decision in context. This is a strategy that has helped AEP Ohio earn public trust while trying to communicate difficult or confusing subjects.

Marketing efforts promote AEP Ohio's corporate citizenship levels in each community AEP Ohio serves. Like every good citizen, AEP Ohio believes it's important to use employees' skills and resources to make communities better places in which to live and work. AEP Ohio also has responsibilities of citizenship: to the environment; to the health and safety of its customers, employees and the general public; to engage with stakeholders; and to the education of future generations.

Policies are established to recognize and support AEP and AEP Ohio overall corporate policies to enhance effective and efficient communication procedures. This includes providing timely, accurate and relevant information to internal and external customers, in addition to informing employees about company strategy, policies, objectives, operations and activities.

Departmental goals and accomplishments are regularly reviewed and updated for the coming year.

II. Strategic and Long-Range Planning

Strategic planning includes an ongoing effort to identify and incorporate modern communication resources into the marketing group's overall marketing plan. This approach helps to ensure flexibility for promoting the variety of programs available to customers regarding energy efficiency, payment assistance and safety. Departmental strategic planning involves identifying issues affecting AEP Ohio and the overall electric industry and identifying effective messaging for customer, general public and employees. For example, previous messages focused on increasing sales of electricity through the location of new and expanded employment centers. Today's messaging is geared towards energy efficiency and conservation, customers' involvement in controlling their own energy use, environmental issues, etc. Another factor in departmental planning is determining the most cost-effective methods to produce and distribute the message. Economic indicators and budget requirements are major factors in the planning process.

III. Organization Structure

The AEP Ohio director - Communications reports directly to AEP Ohio's president and chief operating officer. AEP Ohio's Corporate Communications Department is comprised of the director, six communications consultants and a communications associate.

The group has general responsibilities for internal and external communications, advertising and media relations. The group provides communications services to Transmission, Distribution and Generation organizations within AEP Ohio's service territory. Other areas of responsibility include Energy Efficiency and Peak Demand Response as well as the gridSMART demonstration project.

IV. Decision-Making

The AEP Ohio Corporate Communications team makes decisions by working through the concerns involved in a particular issue and using all available resources. Due to the diversity of information provided to the company's various audiences, the decision-making process can involve consultation among the communications director, the communication consultants and representatives of other departments.

V. Ring Fencing

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AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

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VI. Controlling Process

Several research tools are used to determine the effectiveness of marketing programs with external audiences. These include customer satisfaction surveys, website comments and feedback, social media (facebook, twitter, flickr and YouTube), evaluations of public presentations and media tracking. Verbal communication with customers also is used to judge the effectiveness of marketing methods. In addition, overall attitudes toward the company determine if there are specific changes that can be addressed through marketing programs.

AEP Ohio conducts surveys of thought leaders throughout its service territory to gain open feedback on subjects that affect the company's customers. This feedback will be used in planning the future AEP Ohio messaging and marketing programs.

VII. Communications

AEP Ohio Corporate Communications' marketing efforts promote healthy, informed dialogue about industry restructuring, energy efficiency, safety issues, community involvement, the environment and a wide range of other regulatory and legislative issues. The total marketing plan is designed to provide a basis for the company's stakeholders to conveniently gain additional knowledge about the company and programs it offers and to improve perceptions of the role energy plays in the community. The AEP Ohio Corporate Communications team works closely with news media and other personnel to provide pertinent information and to increase public awareness and understanding about major issues.

The team's external marketing efforts are geared toward multiple venues and mass communications. These efforts cover many subjects but generally fall focus on energy use and conservation, safety, community involvement, operations and customer service. Bill inserts/messages, advertising, press releases/media advisories/media interviews, external website and social media are the primary methods of reaching external audiences. The AEP Ohio Corporate Communications team maintains and updates the company websites, www.aepohio.com and gridsmartohio.com, ensuring the availability of timely and accurate information. AEPOhio.com not only is used as the primary location for service restoration information during major outages situation but also is a marketing mail promoting energy efficiency programs, safety messages, environmental messages, educational resources and AEP Ohio's position on major issues. gridSMARTOhio.com is dedicated to providing information about energy efficiency programs with rebates and cost incentives, plus tips, tools and technologies to reduce energy consumption and save money. Social media also is included in AEP Ohio's marketing efforts to promote programs and announce upcoming community events. AEP Ohio maintains two Facebook pages, two Twitter accounts, a You Tube channel account and a Flickr account in an effort to communicate in a more casual but timely manner. Examples of the home pages of these websites as well as other communications tools are shown under report sections SRF (B)(9)(d)(i and iii) of this report.

AEP Ohio Community Connections is a monthly electronic newsletter distributed to thought leaders within the Ohio service territory to provide an exchange of timely information and strengthen the relationship and trust between the company and thought leaders.

The AEP Ohio Corporate Communications team supports numerous events including county fairs, home shows, NFL Hall of Fame and a variety of other events. The group manages the "Sparking Your Interest" speaker's bureau as an external outreach effort designed to educate and inform customers, community leaders and other stakeholders about significant issues and events affecting both the company and customers. Program topics include Service Reliability and Storm Restoration, American Clean Energy and Security Act and Energy Efficiency. Communications team members are active in their communities, belonging to various organizations to offer their skills and resources to help make their communities better places to live and work.

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Conservation/Demand-Side Management/Integrated Resource Planning
Energy Efficiency/ Peak Demand Response (EE/PDR) Department

SFR Reference

(B)(9)(d)(iv) Marketing

Information regarding marketing also is included in section (i) (ii, iii and v) conservation/demand-side management/integrated resources.

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Communications and Public Affairs

Corporate Communications

SFR Reference
(B)(9)(d)(v) External Relations

I. Policy and Goal Setting

The overall objectives for AEP Ohio's communications and public affairs efforts, as they relate to external relations, are to develop awareness and understanding of the company's position on various issues with its external audiences, successfully remove barriers that would inhibit audience members support of those positions and trigger behavioral responses among members of targeted audiences, depending on the issue, that are positive in support of the company's position.

External relations policy objectives are established by AEP Ohio's executive management team that includes the following positions: president and chief operating officer, vice president - regulatory and finance, vice president - external affairs, vice president - distribution region operations, director - customer services and marketing and director - corporate communications. The objectives support the business plan that is created by the company's executive management team with support from the corporate Strategic Initiatives Group (SIG). The SIG assists various AEP business units, such as AEP Ohio, in drafting and implementing strategic plans, and measuring the financial impact of various strategic alternatives.

In addition, AEP Ohio external relations performance objectives can come from American Electric Power (AEP) corporate executives.

II. Strategic and Long-Range Planning

AEP Ohio's executive management team initiates external relations strategic and long-range planning, with periodic input from AEP corporate executives. Planning takes place annually, and plans are reviewed and adjusted as needed during the year.

III. Organization Structure

AEP executives typically involved in AEP Ohio's external relations activities include:

- AEP chairman and chief executive officer;
 - at times, will interact with state and federal administration and legislative leaders in an effort to encourage government action or inaction in the interest of AEP Ohio and other AEP operating companies;
- AEP president;
 - at times, will interact with state and federal administration and legislative leaders in an effort to encourage government action or inaction in the interest of AEP Ohio and other AEP operating companies;
- president - AEP Utilities; reports to AEP president, who reports to chairman and chief executive officer;

- external relations activities reflect those of chairman and chief executive officer, and the president but are focused primarily on the state level on behalf of AEP Ohio and other AEP operating companies;
- senior vice president - Washington office;
 - leads AEP's Washington office that focuses on lobbying Congress on behalf of AEP Ohio and the interests of other AEP operating companies. reports to chairman, president and chief executive officer; and
- vice president - corporate communications; reports to chairman and chief executive officer;
 - directs communications activities to external audiences primarily on a national scale and within the jurisdictions of AEP operating companies, including AEP Ohio; and
 - in addition, the department oversees the operation of the AEP Political Action Committee that supports select state and federal candidates for political office.

AEP Ohio executives typically involved in the company's external relations activities include:

- president and chief operating officer, who reports to the president – AEP Utilities;
 - the AEP Ohio's chief operating officer is directly responsible for coordination of the company's external relations efforts. The following executives are members of his senior staff and report directly to him:
- vice president - regulatory and finance;
 - vice president - regulatory and finance and his staff are responsible for external relations with Public Utility Commission of Ohio commissioners and staff;
- vice president - external affairs;
 - is AEP Ohio's chief lobbyist, primarily focused on external relations with members of the Ohio Legislature and their respective staffs, members of the governor's administration, non-governmental organizations and various environmental groups; and
 - oversees another lobbyist and a group of community affairs managers who represent the company to state and local government officials and business leaders in designated areas throughout AEP Ohio's service territory;
- vice president - distribution region operations;
 - oversees AEP Ohio's distribution operations, including distribution managers who each are responsible for one of seven distribution districts within AEP Ohio's service territory. These district managers will, on occasion, meet with local and state elected officials or customers to discuss the company's distribution activities in a given area;
- director - customer services and marketing (CS&M);
 - primarily is responsible for overseeing the company's external relations with customers. CS&M employees are assigned to serve residential, commercial or industrial customers;
 - In addition, CS&M director manages the company's energy efficiency and demand response programs and provides for external relations with a variety of customers seeking program support, retailers who sell program products and PUCO staff who monitor the programs; and
- director - corporate communications;
 - manages communications with all AEP Ohio internal and external audiences, overseeing a staff of seven corporate communications professionals who develop, produce and disseminate communications to external audiences on behalf of the company.

Exhibit 1 shows the external relations group's organization chart.

IV. Decision-Making

Decision making, as it relates to external relations, takes place primarily at the operating company (AEP Ohio) level for state and local external relations issues, and at the AEP corporate level for national and federal issues that may affect AEP Ohio and other AEP operating companies.

Some or all members of AEP Ohio's executive management team may participate in state and local issues decisions, depending upon the issues and the audiences it affects. The team members, through their respective staffs, attempt to drive decision making to the lowest possible levels within the organization in keeping with the company's objectives. Team members and their staffs are both proactive and reactive in their external relations efforts. Staff members consult often with subject matter experts in an effort to provide accurate information quickly to external audiences. Major issues are resolved through a collaborative effort of team members and/or their staffs and are reviewed by the team for agreement.

V. Ring Fencing

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VI. Controlling Process

Each member of AEP Ohio's executive management team takes responsibility for implementing the controlling process for their respective area of external relations. The controlling process includes evaluation of each the four components of the company's external relations objectives that may be implemented as they relate to specific issues. For example, if the objective of an external relations communication activity is to create awareness about the company's position on an issue, the team member responsible for that issue must determine if awareness took place among target audience members to a sufficient degree for the company to meet its objective. The same holds true for the objectives of understanding, barrier removal and triggering positive behavior.

If external relations objectives are not met to a sufficient degree, then the team member takes responsibility to implement corrective action.

VII. Internal and External Communications

Internal and external communications as they relate to AEP Ohio external relations are accomplished through a variety of media. Communications are focused on meeting the company's objectives of awareness, understanding, barrier removal and triggering positive behaviors, depending upon the audience and the issue.

Shown below are typical lists of audiences for an external relations effort and the communication methods used to reach each.

Target audiences typically include:

- 1) State legislators; Administration officials and other policymakers – State
- 2) Local elected officials (county, city, village, township) – Local
- 3) Business and community leaders (chambers of commerce, community groups) – Business/Community
- 4) Regulators – PUCO
- 5) News media – NM
- 6) AEP employees in Ohio – Internal-E
- 7) AEP retirees in Ohio – Internal-R
- 8) Non-governmental organizations (OCC, IEU, OEG, CAP) – NGO
- 9) Customers (Industrial, Commercial, Residential) – Customers
- 10) Shareholders – Investors

Exhibit 2 shows the typical audience communication methods.

Exhibit 1 -- External Relations Organization Chart

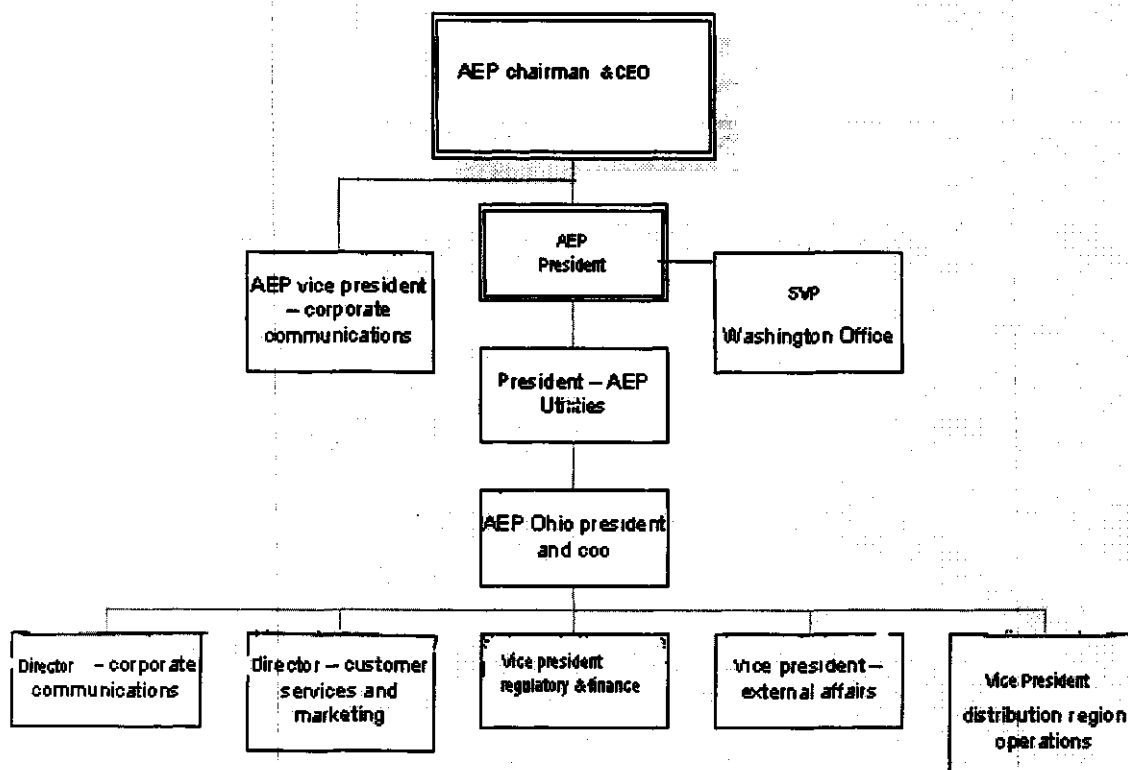


Exhibit 2 – Typical Audience Communication Methods

Audience(s)	Delivery Method
STATE	Letters FTF Meetings Leadership Tours News Releases Electronic Newsletter Telephone Calls
LOCAL	Letters FTF Meetings Leadership Tours News Releases Electronic Newsletter Telephone Calls
BUS/COMM	Letters FTF Meetings Leadership Tours News Releases Electronic Newsletter Telephone Calls
PUCO	Letters FTF Meetings Leadership Tours Telephone Calls
NM	News Releases FTF Meetings Telephone Calls
INTERNAL-E	Intranet Postings Direct Email FTF Meetings
INTERNAL-R	Intranet Postings Direct Email FTF Meetings
NGO	Letters FTF Meetings Leadership Tours Telephone Calls
CUSTOMERS	Internet Postings Social Media News Releases Customer Solutions Center Speakers Bureau

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External Affairs

SFR Reference
(B)(9)(d)(v) External Relations

I. Policy and Goal Setting

The AEP Ohio External Affairs Department manages the company's external relationships with selected customer groups, including elected and administrative officials, professional economic development specialists, educational services providers and a wide variety of non profit business and community based organizations. The vice president - External Affairs sets the goals for the organization and provides measured outcomes for the department's performance against these goals.

II Strategic and Long-Range Planning

The vice president - External Affairs, in concert with the governmental affairs manager, community affairs general manager and the economic development managers, created a strategic plan in 2009 the defines the direction of the department over the next five years (2009 – 2013) with annual reviews to determine its effectiveness and if changes in the external environment create the need for revision.

III. Organization Structure

The External Affairs Department is comprised of eight (8) full-time employees (FTE) and four unfilled FTE positions. The vice president - External Affairs reports to the AEP Ohio president and chief operating officer. The governmental affairs manager, economic development managers and community affairs general manager report directly to the vice president - External Affairs. The community affairs managers (four employees and two unfilled FTE positions) report to the community affairs general manager. The community affairs staff associate supports the External Affairs department and reports to the community affairs general manager. The External Affairs organization is show in Exhibit 1.

IV. Decision-Making

Decisions involving local outcomes often are made by the community affairs managers with some consultation by the community affairs general manager. Legislative and state administrative / executive decision making often is made by the governmental affairs manager in conjunction with vice president - External Affairs and, in some circumstances, including the AEP Ohio president and COO and his direct staff members. Strategic, operational and administrative decisions are made by the vice president - External Affairs, with input from his staff and the AEP Ohio president, as appropriate.

V. Ring Fencing

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registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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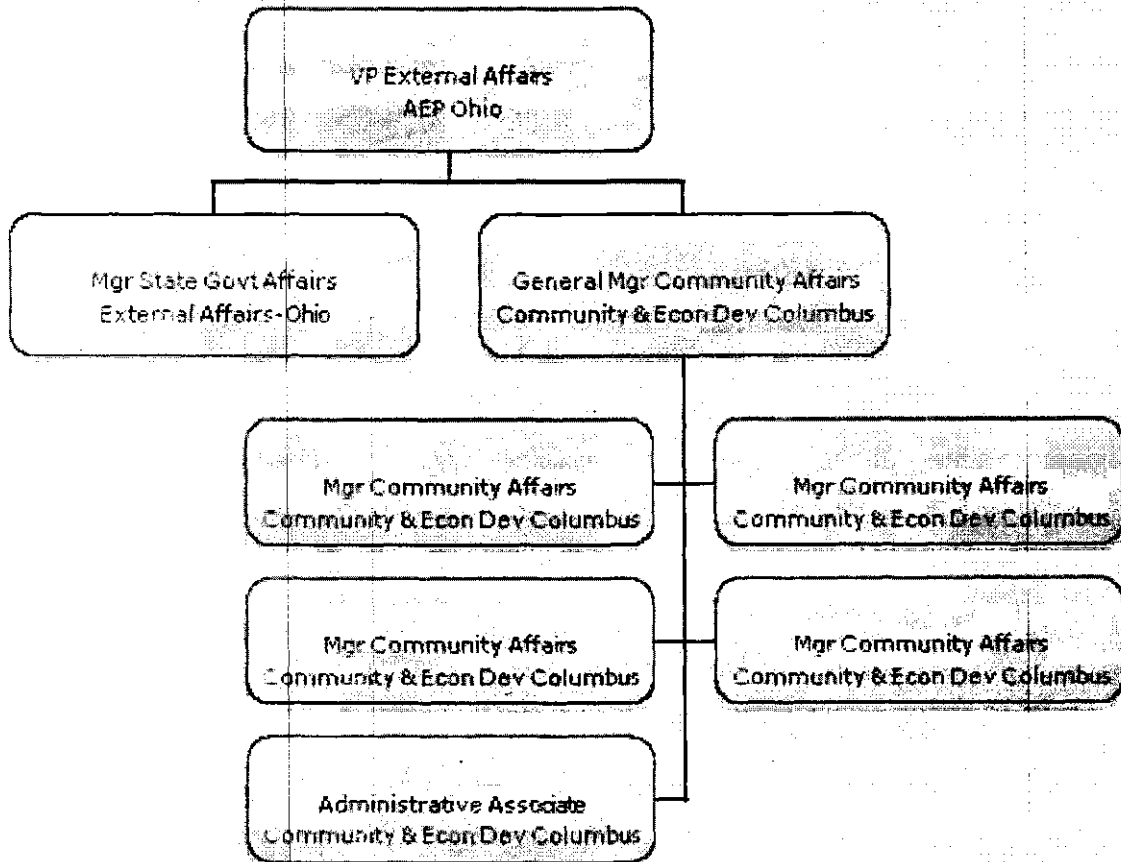
VI. Controlling Process

Operational and administrative control is managed through the departmental leadership, with each individual manager being responsible for budgetary, time reporting, expense reporting and other administrative reporting being compliant. Sarbanes – Oxley accounting procedures, regulatory code of conduct principles and company established ethical and diversity tenets are adhered to and reviewed in regular departmental staff meetings and measured through performance reviews and routine interaction with departmental employees.

VII. Internal and External Communications

The governmental affairs group, with the assistance of the AEP Ohio corporate communications group, provides a monthly email letter detailing the ongoing legislative and political activities associated with the company's legislative and congressional lobbying efforts. The community affairs group, in conjunction with the AEP Ohio corporate communications group, provides two monthly email pieces directed to local community leaders, business leaders, elected leaders and those managing civic and community groups.

Exhibit 1 – External Affairs Organization Chart



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SFR Reference

(B)(9)(d)(v) Government Affairs

I. Policy and Goal Setting

Public policy goals and the legislative agenda for the company are established by the AEP Ohio leadership team under the guidance of the vice president - External Affairs with consultation from the AEP executive office.

II. Strategic and Long-Range Planning

Based upon the assessment of the External Affairs department's management group, effects associated with known and predicted legislative activity and their real and perceived effects upon AEP Ohio, its employees, shareholders, customers and communities determine the appropriate strategies undertaken to derive the most beneficial outcomes for the above mentioned groups.

III. Organization Structure

Within the External Affairs department, the vice president, governmental affairs manager and community affairs general manager are registered lobbyists for both the legislative and executive branches of Ohio's state government. The governmental affairs manager and community affairs general manager report directly to the vice president - External Affairs.

IV. Decision-Making

Decisions are made by the governmental affairs manager as they pertain to individual discussions with legislators and executive branch representatives in response to inquiries and routine requests for additional information. Strategic decisions and those requiring greater detail pertaining to newly arising issues and their effects are made by the vice president - External Affairs, and as appropriate, in consultation with AEP Ohio's leadership team and the AEP executive office.

V. Ring Fencing

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VI. Controlling Process

The vice president of External Affairs provides oversight and direction in the performance of legislative and lobbying activities in the governmental affairs section. Ongoing and routine legislative activity assessment and analysis by the vice president - External Affairs, in conjunction with the governmental affairs manager, provides opportunity to review internal activities and measure performance evaluations. JLEC filings, expense reporting, time reporting and routine internal communications provide additional oversight opportunities. Contributions to political candidates are managed through the AEP Political Action Committee group and approved by a committee of employees comprising each of the operating companies within the AEP System. Contributions are directed by this committee based upon recommendations provided by the governmental affairs and External Affairs managers.

VII. Internal and External Communications

The governmental affairs manager provides utility, energy, environmental and other pertinent information to external parties in response to inquiries or by through initiatives aimed to inform, educate and raise awareness around issues, events or activities designed to provide the company's public policy perspectives.

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SFR Reference
(B)(9)(d)(v) Community Affairs

I. Policy and Goal Setting

Goals are established by the vice president - External Affairs and community affairs general manager, working with the Community Affairs Managers to implement measure and achieve the desired outcomes.

II. Strategic and Long-Range Planning

The community affairs organization implements the community portion of the External Affairs departmental goals. Goals are designed to support efforts that strengthen the communities AEP Ohio serves through economic development, community development, philanthropic and other activities that promote a sustainable quality of life in the community.

III. Organization Structure

The community affairs general manager reports directly to the vice president - External Affairs. The community affairs managers and community affairs staff associate report directly to the community affairs general manager.

IV. Decision-Making

Community Affairs Managers are encouraged to make decisions based upon local knowledge and within their range of job duties and geographic territories. Decisions regarding issues that transcend assigned territories or have broader implications / impacts upon AEP Ohio are discussed with the Community Affairs General Manager and decided upon as appropriate. Consulting with the Vice president - External Affairs, the Community Affairs General Manager makes administrative and other operational related decisions for the AEP Ohio Community Affairs group.

V. Ring Fencing

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VI. Controlling Process

Community affairs managers and the community affairs staff associate complete a variety of internal forms by which they report their activities, expenses, customer contacts / communications and safety performance. These reports are completed daily, biweekly, quarterly and annually. Job performance is reviewed in an ongoing manner through internal processes.

VII. Internal and External Communications

The community affairs group communicates using phone, fax, written communications and emails with both internal and external parties. Membership in business, academic and non profit organizational boards or directors assists the community affairs managers in staying abreast of issues and opportunities within the communities AEP Ohio serves. External relationships allow local community leaders an opportunity to work more directly with the company in areas of mutual concern and can provide greater access to company resources and insight into AEP Ohio's public policy positions. The community affairs group provides timely weather alerts to selected first responder and public officials during times when approaching weather raises public safety concerns. Monthly newsletters provided to local community leaders detail issues of mutual interest and provide an ongoing electronic dialogue around company activities and events.

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SFR Reference
(B)(9)(d)(v) Economic Development

I. Policy and Goal Setting

The vice president - External Affairs sets policy and goals for the economic development group in consultation with the economic development managers.

II. Strategic and Long-Range Planning

The economic development group works with local, regional and statewide economic development organizations throughout the AEP Ohio service area, providing operational support, prospect coordination and encouraging sustainable economic development activities in our communities. The economic development group provides financial assistance to local economic development partners in aiding them in their retention and expansion efforts with existing businesses and industries.

III. Organization Structure

The state economic development managers directly report to the vice president - External Affairs. The community affairs general manager provides indirect supervision and assists in coordinating activities with the community affairs group.

IV. Decision-Making

Local and programmatic decision making is routine and conducted by the state economic development managers. Prospect related agreements are reviewed by the vice president - External Affairs, often engaging the community affairs general manager and staff.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and

3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts, each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The economic development group submits programming expenditures for annual audits conducted internally as well as providing information to the PUCO for its review and comment. Expense reporting, time reporting and quarterly job performance reviews, as well as routine and frequent interaction with supervision, provide management with current insight into the company's external economic development partnerships.

VII. Internal and External Communications

The state economic development group works with local, state and regional external partners in promoting retention and expansion of existing businesses and in attracting new employers to communities within AEP Ohio's service territory. The group routinely meets with various local economic development groups as well and the Ohio Department of Development regarding economic development activities in Ohio.

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AEPSC Customer Services and Marketing

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective for AEPSC Customer Services and Marketing is to develop and administer marketing programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users. The department also develops and administers procedures to provide accurate billings for electric energy, maintains internal controls for accounts receivable, and develops and administers policies and procedures for the customer accounts function.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process of the AEPSC Customer Service and Marketing Department is developed by the vice president - Customer Services, Marketing and Distribution Services and his staff. Meetings are held with senior management to determine how to best integrate a policy that will serve the interests of stockholders, customers and employees.

Resource Planning and Operational Analysis provides input and review related to forecasted AEP System generation capability and expected customer energy and demand use as provided in the long-term forecast filed with the commissions. Corporate Communications provides input and review related to matters of corporate image and identification in the customer environment. Regulatory Services provides input and review of electric pricing options and strategies. The executive departments provide input and review of corporate objectives including financial and human resource plans.

The vice president - Customer Services, Marketing and Distribution Services and his staff also meet with operating company Customer Services and Marketing departments to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART[®].

Strategic planning includes the on-going succession identification process designed to timely determine candidates for key company position and to assure their development to meet position requirements to maintain the high level of management expertise necessary to manage the enterprise effectively.

III. Organization Structure

The AEPSC Customer Services, Marketing and Distribution Services department is managed by the vice president - Customer Services, Marketing and Distribution Services, who reports to the president - AEP Utilities.

The department is organized into seven sections: Business and Performance Management, under the supervision of the director - Business and Performance Management; Consumer Technologies and Programs, under the supervision of the director - Consumer Technologies and Programs; Distribution Reliability, Planning and Engineering, under the supervision of director - Distribution Reliability, Planning and Engineering; Utility Group Systems, under the supervision of director - Utility Group Systems; Consumer Programs, under the supervision of director - Consumer Programs; Research and Technology, under managing director - Research and Technology; and Customer Services, under the supervision of managing director - Customer Services.

Department employees include engineers, accountants, economists, marketers and analysts.

An organization chart of the AEPSC Customer Services, Marketing and Distribution Services Department is provided as Exhibit 1.

AEP Ohio Customer Services and Marketing, which serves subsidiaries CSP and OP, is responsible for maintaining open communications between the customer and AEP Ohio about billing and account-related questions. The group handles the promotion of all types electrical applications that emphasize or combine high efficiency, load management, energy conservation, demand-side management and safety. The department supports existing and potential commercial and industrial customers in their efforts to retain current levels of business within their markets, increase their market share, or enter into new product lines or types of service. The department supports the attributes of the communities and facilities available in AEP Ohio's service area to potential industrial/commercial customers, where relocation in the service area would increase jobs and stimulate the economy.

AEP Ohio Customer Services and Marketing is managed by the director - Customer Services and Marketing, who reports to the AEP Ohio president and chief operating officer.

IV. Decision-Making

Decision making is coordinated through the vice president - Customer Services, Marketing and Distribution Services who:

1. meets formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services, Marketing and Distribution Services Department to discuss, review and make decisions about customer service and marketing strategies for the AEP System;
2. meets formally on a bi-monthly basis with operating company customer service and marketing directors and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about marketing and customer service strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with operating company personnel to discuss, review and make decisions about strategies for individual operating companies; and
3. attends weekly staff meetings with AEPSC senior management and operating company presidents to discuss, review and make decisions about corporate customer service and marketing strategy.

All customer service and marketing personnel, from the vice president - Customer Services, Marketing and Distribution Services to the customer services and marketing representatives of the operating companies, make daily decisions regarding meeting company goals as established by Customer Services, Marketing and Distribution Services policy. These decisions generally involve two criteria: benefit to the customer and consistency with company policy.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. The vice president - Customer Services, Marketing and Distribution Services is responsible for controlling expenditures within the department-approved budget. Monthly reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

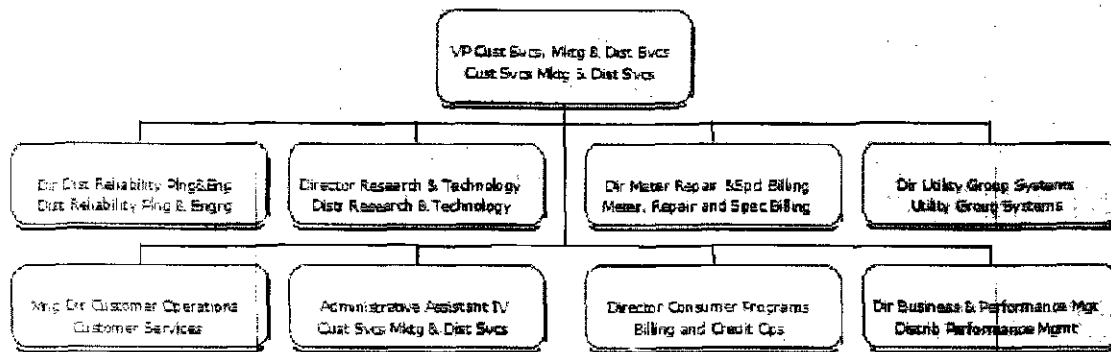
Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), and internal and external website postings.

Internal communications within the department consist of staff meetings that involve managers and supervisors and other employees as required. Safety meetings are held monthly with all employees. In addition, informal meetings are held on an as needed basis to discuss daily assignments, work

processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted. Periodic meetings are held with employees across the AEP System to provide a forum for customer service and marketing employees to exchange information on the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with industry trade organizations, equipment dealers and installers, developers, architects and engineers. These discussions often center on new technologies, policy, standards, service quality or energy efficiency programs.

Exhibit 1 – AEPSC Customer Services, Marketing and Distribution Services Organization Chart



American Electric Power
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AEPSC Customer Services and Marketing
Consumer Programs and Technologies

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing

I. Policy and Goal Setting

The overall objective for AEPSC Consumer Programs and Technologies is to develop and administer marketing programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users. The department also develops and administers procedures to provide accurate billing for electric energy, maintains internal controls for accounts receivable and develops and administers policies and procedures for the customer accounts function.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process for Consumer Programs and Technologies is developed by the director - Consumer Programs and Technologies and his staff. Meetings are held with senior and middle management to determine how to best integrate a policy that will serve the interests of stockholders, customers and employees.

Resource Planning and Operational Analysis provides input and review related to forecasted AEP System generation capability and expected customer energy and demand use as provided in the long-term forecast filed with the public utility commissions. Corporate Communications provides input and review related to matters of corporate image and identification in the customer environment. Regulatory Services provides input and review of electric pricing options and strategies. The executive departments provide input and review of corporate objectives including financial and human resource plans.

The director - Consumer Programs and Technologies and his staff also meet with operating company Customer Services and Marketing groups to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART[®].

III. Organization Structure

The AEPSC Customer Services, Marketing and Distribution Services department is managed by the vice president - Customer Services, Marketing and Distribution Services, who reports to the president - AEP Utilities. The consumer programs and technologies group is managed by a director.

IV. Decision-Making

Decision making is coordinated through the director - Consumer Programs and Technologies who:

1. meets both formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services, Marketing and Distribution Services Department to discuss, review and make decisions about consumer programs and technology strategies for the AEP System; and
2. meets formally on a bi-monthly basis with operating company customer service and marketing directors and managers, and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about consumer programs and technology strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with operating company personnel to discuss, review and make decisions about strategies for individual operating companies.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. Monthly reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), internal and external website postings.

Internal communications within the department consist of staff meetings which involve managers and supervisors and other employees as required. Safety meetings are held monthly with all employees. In addition, informal meetings are held on an as needed basis to discuss daily assignments, work processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

Periodic meetings are held with employees across the AEP system to provide a forum for customer service and marketing employees to exchange information on the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with industry trade organizations, equipment dealers and installers, developers, architects and engineers. These discussions often center on new technologies, policy, standards, service quality, or energy efficiency programs

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AEPSC Customer Services and Marketing
Utility Group Systems

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective for AEPSC Utility Group Systems is to develop and maintain systems in conjunction with the Information Technology Department. These systems include, but are not limited to, distribution work management, outage management, customer information systems, call center and account management systems. The department also communicates system effects associated with new releases, bug-fixes or system outages to effected operating company personnel.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process of Utility Group Systems is developed by the director - Utility Group Systems and his staff. Meetings are held with senior and middle management to determine how to best integrate a policy that will serve the interests of stockholders, customers and employees.

The operating companies provide input related to system requirements and desired operational and safety improvements. The Regulatory Services Department provides input and review of regulatory and tariff changes.

The director - Utility Group Systems and his staff also meet with operating company Customer Services and Marketing departments to receive input and review matters related to customer service, distribution operations, energy efficiency and peak demand response, gridSMART[®] and customer satisfaction. The director also meets on a bi-monthly basis with the Information Technology Operating Committee to prioritize, review and approve new IT systems, retirements of existing IT systems and modifications to IT systems.

III. Organization Structure

The AEPSC Customer Services, Marketing and Distribution Services department is managed by the vice president - Customer Services, Marketing and Distribution Services, who reports to the president - AEP Utilities. The Utility Group Systems is managed by a director.

IV. Decision-Making

Decision making is coordinated through the director - Utility Group Systems who:

1. meets both formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services, Marketing and Distribution Services Department to discuss, review and make decisions about customer service and marketing strategies for the AEP System; and
2. meets formally on a bi-monthly basis with operating company Customer Service and Marketing directors and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about consumer programs and technology strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with operating company personnel to discuss, review and make decisions about strategies for individual operating companies.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. Monthly reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), internal and external website postings.

Internal communications within the department consist of staff meetings which involve managers and supervisors and other employees as required. Safety meetings are held monthly with all employees. In addition, informal meetings are held on an as needed basis to discuss daily assignments, work processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

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AEPSC Customer Services and Marketing
Consumer Programs

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective for AEPSC Consumer Programs is to develop and administer marketing programs to promote electrical equipment applications that are high-efficiency, load managing and/or energy conserving for residential, commercial and industrial users. The department also develops and administers procedures to provide accurate billings for electric energy, maintains internal controls for accounts receivable and develops and administers policies and procedures for the customer accounts function.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process for Consumer Programs is developed by the director - Consumer Programs and his staff. Meetings are held with senior and middle management to determine how to best integrate a policy that will serve the interests of stockholders, customers and employees.

Resource Planning and Operational Analysis provides input and review related to forecasted AEP System generation capability and expected customer energy and demand use as provided in the long-term forecast filed the commissions. Corporate Communications provides input and review related to matters of corporate image and identification in the customer environment. Regulatory Services provides input and review of electric pricing options and strategies. The executive departments provide input and review of corporate objectives, including financial and human resource plans.

The director - Consumer Programs and Technologies and his staff also meet with operating company Customer Services and Marketing departments to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART[®].

III. Organization Structure

The AEPSC Customer Services, Marketing and Distribution Services department is managed by the vice president - Customer Services, Marketing and Distribution Services, who reports to the president - AEP Utilities. The consumer programs group is managed by a director.

IV. Decision-Making

Decision making is coordinated through the director - Consumer Programs and Technologies who:

1. meets formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services, Marketing and Distribution Services Department to discuss, review and make decisions about customer service and marketing strategies for the AEP System; and
2. meets formally on a bi-monthly basis with operating company customer service and marketing directors and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about consumer programs and technology strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with operating company personnel to discuss, review and make decisions about strategies for individual operating companies.

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Internal communications within the department consist of staff meetings which involve managers and supervisors and other employees as required. Safety meetings are held monthly with all employees. In addition, informal meetings are held on an as needed basis to discuss daily assignments, work processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

Periodic meetings are held with employees across the AEP system to provide a forum for customer service and marketing employees to exchange information on the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with industry trade organizations, equipment dealers and installers, developers, architects and engineers. These discussions often center on new technologies, policy, standards, service quality or energy efficiency programs.

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AEPSC Customer Services and Marketing
Customer Services

SFR Reference

(B)(9)(d)(i) Customer Service and Information

I. Policy and Goal Setting

The overall objective for AEPSC Customer Services is to develop, implement and administer customer services programs for residential, commercial and industrial customers who contact AEP via the telephone or website. The department also develops and administers procedures to provide accurate information regarding billings for electric energy, services disconnects and reconnects and outages. They serve as the primary point of contact and source of information for all but the managed accounts that are handled primarily by the operating companies.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process for Customer Services is developed by the managing director - Customer Services and his staff. Meetings are held with senior and middle management to determine how to best integrate a policy that will serve the interests of stockholders, customers and employees.

Corporate Communications provides input and review related to matters of corporate image and identification in the customer environment. Regulatory Services provides input and review of electric pricing options and strategies. The executive departments provide input and review of corporate objectives, including financial and human resource plans.

The managing director - Customer Services and his staff also meet with operating company customer service and marketing departments to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART[®].

III. Organization Structure

The AEPSC Customer Services, Marketing and Distribution Services department is managed by the vice president - Customer Services, Marketing and Distribution Services, who reports to the president - AEP Utilities. The customer services group is managed by a managing director.

IV. Decision-Making

Decision making is coordinated through the managing director - Customer Services who:

1. meets formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services, Marketing and Distribution Services Department to discuss, review and make decisions about customer service and marketing strategies for the AEP System; and

2. meets formally on a bi-monthly basis with operating company customer service and marketing directors and informally on an as-needed basis with staff of the operating companies to discuss, review and make decisions about consumer programs and technology strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with operating company personnel to discuss, review and make decisions on strategies for individual operating companies.

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3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. Monthly reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), internal and external website postings.

Internal communications within the department consist of staff meetings which involve managers and supervisors and other employees as required. Safety meetings are held monthly with all employees. In addition, informal meetings are held on an as needed basis to discuss daily assignments, work processes, and work problems, concerns, or suggestions. Formal job performance reviews are conducted by supervisory staff with every employee once a year and more frequently if warranted.

Periodic meetings are held with employees across the AEP system to provide a forum for customer service and marketing employees to exchange information on the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with industry trade organizations, equipment dealers and installers, developers, architects and engineers. These discussions often center on new technologies, policy, standards, service quality or energy efficiency programs.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (i, iii, iv and v)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2

AEP Ohio Customer Services and Marketing

SFR Reference

(B)(9)(d)(i)	Customer Service and Information
(B)(9)(d)(iii)	Customer Conservation Programs
(B)(9)(d)(iv)	Marketing
(B)(9)(d)(v)	External Relations

I. Policy and Goal Setting

The overall objective of AEP Ohio Customer Services and Marketing is to develop and administer procedures to provide accurate billings for electric energy, maintain internal controls for accounts receivable and resolve customer inquiries regarding billing, service reliability and power quality. The Customer Services and Marketing Department also develops programs to promote electrical equipment applications that are high-efficiency, load managing or energy conserving for residential, commercial and industrial users to meet the benchmarks established in Ohio Senate Bill 221. Customer Services and Marketing also acquires and promotes advanced and alternative energy resources to meet the targets established in S.B. 221.

II. Strategic and Long-Range Planning

The principal strategic and long-range planning process of the Customer Services and Marketing Department is developed by the director - Customer Services and Marketing in conjunction with her staff. Meetings are held with senior management to determine how to best integrate policies that will serve the interests of stockholders, customers and employees.

The director - Customer Services and Marketing and her staff also meet with Customer Services and Marketing departments of the other AEP operating companies to receive input and review matters related to customer service, energy efficiency and peak demand response, marketing, market research and gridSMART[®]. The director and her staff incorporate input from AEPSC Customer Services directors, Regulatory Services and Corporate Communications in the development of the strategic plan.

Strategic planning includes the on-going succession identification process designed to identify candidates for key company positions in a timely manner. The process also assures candidates' development to meet position requirements to maintain the high level of management expertise necessary to manage the enterprise effectively.

III. Organization Structure

The AEP Ohio Customer Services and Marketing Department is managed by the director - Customer Services and Marketing who reports to the president and chief operating officer of AEP Ohio.

The department is organized into four sections. Customer Services and Marketing is under the supervision of two managers. Energy Efficiency and Peak Demand Response EE/PDR is under the supervision of a manager. The Advanced and Alternative Energy section is under the supervision of a manager. The gridSMART Demonstration Project team is under the supervision of the project manager.

Department employees include engineers, accountants, customer service representatives and analysts.

An organization chart of the AEP Ohio Customer Services and Marketing Department is provided as Exhibit 1.

AEP Ohio Customer Services and Marketing group, which serves subsidiaries CSP and OP, is responsible for maintaining open communications between the customer and AEP Ohio regarding billing and account-related questions. The group handles the promotion of all types electrical applications that emphasize and combine high efficiency, load management, energy conservation, demand-side management and safety. In addition to residential customers, the department supports existing and potential commercial and industrial customers in their efforts to retain current levels of business within their market, increase their market share or enter into new product lines or types of service. The department supports the attributes of the communities and facilities available in the service area to potential industrial/commercial customers where relocation in the service area would increase jobs and stimulate the economy.

IV. Decision-Making

Decision making is coordinated through the director - Customer Services and Marketing who:

4. meets formally on a weekly basis and informally on an as-needed basis with the staff of the Customer Services and Marketing Department to discuss, review and make decisions about customer service and marketing strategies for AEP Ohio;
5. meets formally on a bi-monthly basis with AEPSC and other operating companies customer service and marketing directors and informally on an as-needed basis with staff of AEPSC and the operating companies to discuss, review and make decisions about marketing and customer service strategies for the AEP System. In addition, telephone communications are used on an as-needed basis with AEPSC and operating company personnel to discuss, review and make decisions on strategies; and
6. attends weekly staff meetings with AEP Ohio senior management to discuss, review and make decisions about customer service and marketing strategy.

All customer service and marketing personnel, from the director - Customer Services and Marketing to the Customer Services and Marketing representatives, make daily decisions regarding meeting company goals as established by Customer Services and Marketing policy. These decisions generally involve two criteria: benefit to the customer and consistency with company policy.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

Budgetary guidelines are established annually by senior management. The department prepares personnel, salary and expense budgets in accordance with company guidelines. The Customer Services and Marketing director is responsible for controlling expenditures within the department-approved budget. Monthly reviews are made and explanations for deviations from the approved budget are prepared for senior management. Necessary action is taken to reduce costs when actual costs are excessive in relation to the budget.

VII. Internal and External Communications

AEP Ohio Customer Services and Marketing group, which serves subsidiaries CSP and OP, is responsible for maintaining open communications between the customer and AEP Ohio about billing and account-related questions. The group handles the promotion of all types of electrical applications that emphasize and combine high efficiency, load management, energy conservation, demand-side management and safety. In addition to residential customers, the department supports existing and potential commercial and industrial customers in their efforts to retain current levels of business within their markets, increase their market share, or enter into new product lines or types of service. The department supports the attributes of the communities and facilities available in the service area to potential industrial/commercial customers where relocation in the service area would increase jobs and stimulate the economy.

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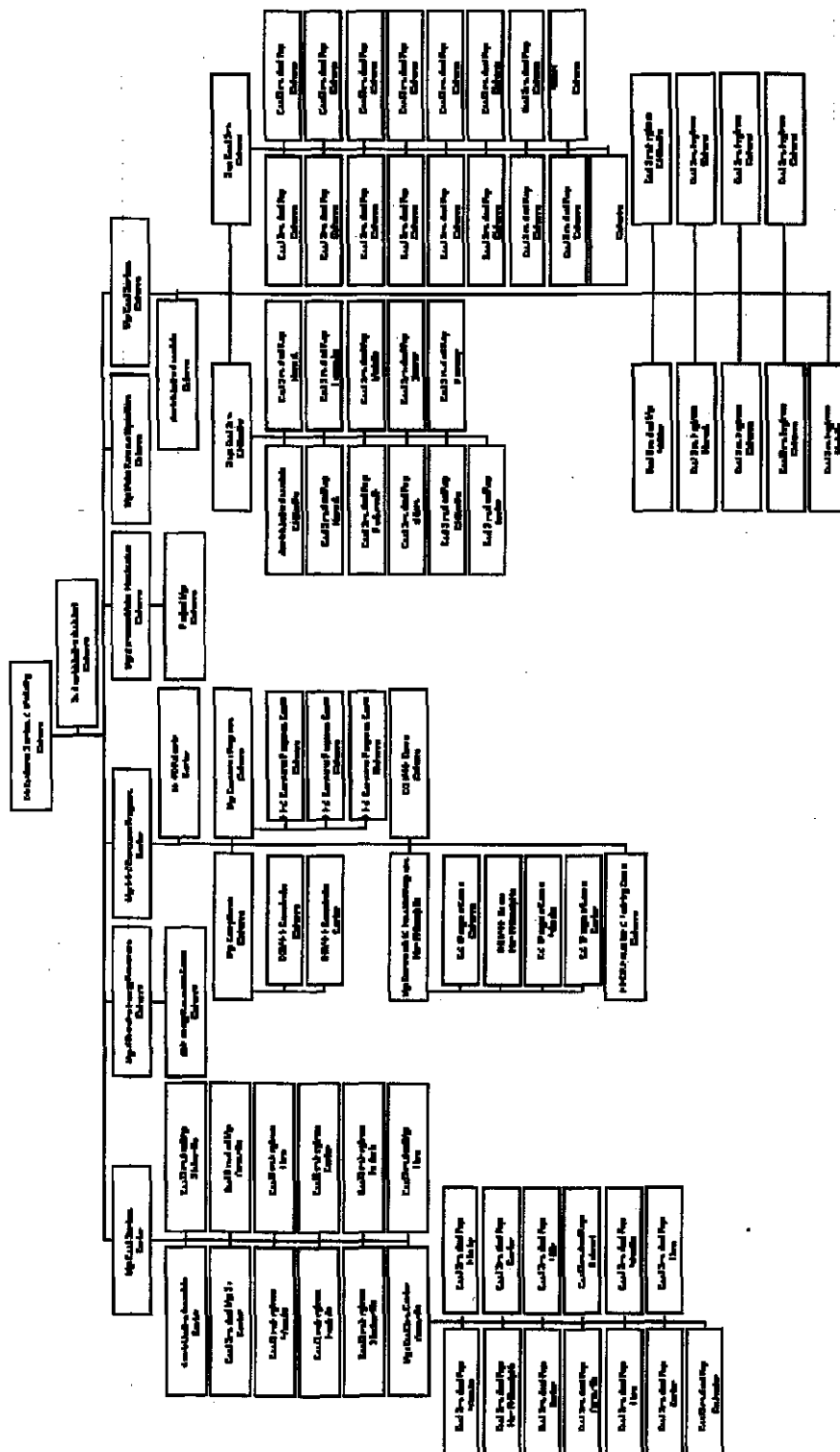
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Periodic meetings are held with employees across the AEP System to provide a forum for customer service and marketing employees to exchange information about the achievement of goals and the most effective means for providing services to customers.

Department personnel are heavily involved in external communications with existing and potential customers, equipment dealers and installers, developers, architects and engineers. These discussions often center around service quality, expansion plans or energy efficiency programs. With the evolution of the smart grid, customer services personnel also are talking more with customers about reliability improvements, energy management opportunities and enabling technologies.

Group employees also communicate by telephone, in writing or in person regarding the availability of special programs, such as Neighbor-to-Neighbor, to assist low income customers. Information also is provided on billing alternatives, such as the Average Monthly Payment (AMP) plan or Budget Billing. AEPOhio.com also offers much information about these programs and more.

Exhibit 1 – AEP Ohio Customer Services and Marketing Organization Chart



American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (d) (iii and iv)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2

Customer Services and Marketing
Customer Conservation Programs and Marketing

SFR Reference

(B)(9)(d)(iii) Customer Conservation Programs
(B)(9)(d)(iv) Marketing

Information regarding (B)(9)(b)(iii and iv) also is included in section (i) conservations/demand-side management.

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e) (I)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Support Services

Legal Department

SFR Reference

(B)(9)(e)(i) Legal

I. Policy and Goal Setting

The Legal Department's goal is to ensure, in the most cost-effective manner, that AEPSC and AEP operating companies, including CSP and OP, doing business as AEP Ohio, conduct business in a manner that complies with all applicable state and federal laws and regulations.

The senior vice president and general counsel is a member of AEP's executive council, which reviews all major issues confronting the company. He is responsible for recommending and implementing legal policies for AEP and its operating companies and for the Legal Department.

The Legal Department reviews policies for compliance with state and federal law and agency regulations. Company policies are communicated to employees orally at staff meetings and in writing. Legal Department policies and goals are reviewed at regularly scheduled staff meetings.

Legal Department goals are developed each year through a process that identifies key targets and success factors, which principally focus on supporting the business units. At the end of each quarter, achievements are evaluated and reported to the company.

Legal departmental policies and procedures are promulgated by the general counsel.

II. Strategic and Long-Range Planning

The executive management of the company has the primary responsibility for establishing the company's strategic plan. The Legal Department's primary function with regard to the strategic plan is to advise management with respect to compliance with state and federal law and agency regulations and otherwise to provide material legal assistance in achieving the strategic plan. Frequently, members of the Legal Department serve on task forces responsible for the analysis and implementation of major corporate goals. In addition, goals are established within the Legal Department to support the company's strategic plan. Strategic planning also includes succession planning for senior members of the Legal Department.

III. Organization Structure

The Legal Department is managed by the senior vice president, general counsel and corporate secretary. He reports to the chairman and chief executive officer of AEP.

The general counsel is assisted by three deputy general counsels, each of whom supervises several different role groups. An organizational chart is attached as Exhibit LD -1

The Legal Department is divided into eight functional role groups. These groups are: 1) Finance and Compliance; 2) Regulatory Services East, West, and FERC; 3) Litigation; 4) Environment, Health and Safety; 5) Transactions, Commercial Operations and Logistics; 6) Real Estate; 7) Tax and 8) Nuclear.

The Legal Department is centralized, with approximately 47 attorneys providing a range of legal services across the company. Timekeeping requirements have been implemented to allocate time and costs accurately.

The Legal Department includes attorneys, paralegals and administrative support personnel. The Legal Department employs summer law clerks and contractors from time to time. All personnel are executive, managerial, supervisory, administrative or professional employees.

The Legal Department serves as counsel and provides legal services for the boards of directors, officers and employees in their performance of job-related duties. Such services include:

- providing general legal research and advice on matters which may arise in the course of the company's business;
- reviewing the legal aspects of company operations for compliance with federal, state and local statutes and regulations;
- promptly notifying appropriate personnel of any changes necessitated by administrative or judicial decisions or by the enactment or adoption of new laws or regulations or amendments to existing statutes or regulations;
- developing and implementing preventive law programs;
- drafting documents and providing legal support for transactions for the company;
- reviewing and advising on contractual obligations of the company; and
- representing the company in regulatory and judicial proceedings by acting as counsel or by monitoring and directing outside counsel engaged for such purpose.

Each role group has specific areas of responsibility as follows:

1) Finance and Compliance

Finance & Compliance lawyers advise and support the board of directors, including advice on complying with the Sarbanes-Oxley Act and the Dodd-Frank Act. Lawyers in this group provide advice about compliance with the federal securities laws and New York Stock Exchange regulations. They also advise and assist management with periodic and current reports, proxy statements, information statements and other SEC filings. The group assists management in all financing transactions, including sales of registered and unregistered securities, bank borrowings, lease transactions and other financing transactions. Lawyers also provide assistance to the Investor Relations, Corporate Communications and Accounting departments.

2) Regulatory Services East, West and FERC

Lawyers in the Regulatory Services East, West & FERC represent the utilities before all state and federal regulatory bodies in proceedings determining those companies' rates and tariffs. Lawyers help with rate case preparations and develop cases in conjunction with Regulatory and Accounting Department personnel. The lawyers also function as trial counsel in these proceedings. Counsel also is involved in integrated resource planning, regulatory licensing and permitting of utility facilities. The lawyers also assist in the negotiation and review of special contracts and interconnection agreements for customers.

Counsel in this section also are responsible for representing the company in rulemakings, roundtables and other policy-setting initiatives of the respective state regulatory agencies, and the Federal Energy Regulatory Commission.

3) Litigation

Counsel in this section address all types of litigation matters on behalf of the company. Litigation counsel represent the company in actions involving commercial transactions, personal injury, property damage, alleged statutory violations, employment and labor disputes, and credit and collection related matters, including bankruptcy cases. They assist management in determining the merits of pursuing legal action. They also are responsible for selecting and supervising any outside counsel. The lawyers advise management on settlement and trial strategy. They coordinate investigative efforts, witness interviews, testimony and exhibit preparation and formulation of strategy in every case. They also train company personnel in investigative techniques and counsel management and employees involved in claims actions.

4) Environment, Health and Safety

Counsel in this section have responsibility for all environment-related issues, primarily compliance with all federal and state laws and regulations. Counsel also advises on licensing and the siting of utility facilities. They also represent the company before federal and state agencies and courts, when necessary, and direct outside counsel assisting the company in these matters. Lawyers in this group also review, analyze and comment upon proposed environmental statutes and rules.

Counsel in this section also provides advice on laws relating to safety and health, including advising management on compliance with OSHA and related laws.

5) Transactions, Commercial Operations and Logistics

Counsel in this group have responsibility for all commercial contract and transactional work involving the company. They are responsible for drafting, reviewing and negotiating commercial contracts for all aspects of the company's operations, including construction, engineering services, procurement of coal, gas, limestone and lime, rail and barge transportation, software licensing, long- and short-term power purchases or sales, and all major capital expenditures. In addition, the group is involved in negotiating agreements to acquire or dispose of company assets, such as acquiring new generation or selling existing generation. They also assist management in resolving contract disputes, such as nonperformance by third party suppliers. Lawyers in this group also register and preserve trademarks and service marks, and provide legal advice on all intellectual property issues.

6) Real Estate

This section handles all real estate matters for the company, including easements and rights of way related to transmission and distribution lines. They prepare and review documents for the purchase or sale of real property. The lawyers also monitor federal and state law developments regarding pole attachment and joint use issues, and prepare contracts relating to pole attachments or joint use with other utilities or third parties.

7) Tax

This section advises management about all tax matters that impact the company's business. Lawyers advise the company about any new or proposed tax laws, regulations and rulings, and recommend changes in tax laws that might benefit the AEP System. Lawyers in this group also advise the Human Resources Department on all employee benefit plans, such as pension and health and insurance plans. Lawyers also represent various AEP companies at tax appeals hearings, and offer legal advice on all matters raised by federal and state tax auditors.

8) Nuclear (for Indiana Michigan Power Company's D.C. Cook Plant)

Nuclear counsel assists management in complying with laws and regulations pertaining to all aspects of nuclear plant operations. They also support management in all proceedings and filings made with the Nuclear Regulatory Commission.

Paralegals

The paralegals each have specific assignments within one or more of the role groups. They are directly responsible to the section head and the attorneys in each section for their substantive workload.

Administrative Support Personnel

The administrative support personnel provide document and administrative support. Designated individuals also assist with timekeeping, bill processing, library maintenance, budgeting and computer training for the department.

Contractors

The Legal Department employs contractors as necessary to address peak workload situations and to help manage permanent employee levels. Contractors can include, from time-to-time, lawyers, paralegals and administrative support personnel.

IV. Decision-Making

The responsibilities for decision making rest with the business unit that has:

- the information to effectively implement the decision;
- the necessary facts to apply sound judgment based on Company policies, procedures, and directives; and
- the authority to take effective action.

The Legal Department acts in an advisory capacity to other business units and departments at the company. The decision to use inside or outside counsel is made by the Legal Department, and if outside counsel is obtained, the Legal Department manages their work.

In addition, the Legal Department manages the company's activities in judicial and administrative proceedings.

The criteria used in all decisions made within the Legal Department are in compliance with all applicable laws and the provision of legal services in the most cost effective manner to the company. Daily decisions are made concerning legal matters within the scope of work of each of the role groups. Major decisions are reviewed with the general counsel.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). AEP was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as

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VI. Controlling Process

The general counsel maintains responsibility for the assignment of cases or projects, budgeting and personnel decisions, and the overall management of the Legal Department. Budgetary guidelines are established annually by senior management, and each department, including the Legal Department, prepares annual budgets. The general counsel is responsible for controlling expenditures within the department's approved budget.

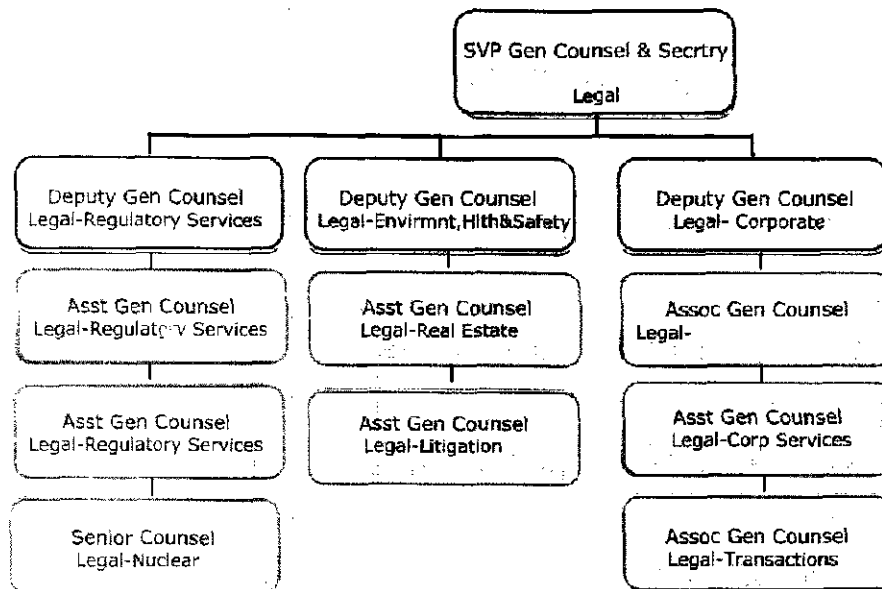
The attorneys within each role group work independently or in collaboration, as appropriate, on matters assigned to them within their areas of expertise and responsibility. Monthly meetings between the general counsel and his senior staff, including all the role group supervisors, allow those lawyers to review present cases, address administrative issues, and update each other on major recent developments in each of their specific areas of expertise. Other meetings are called when necessary to address particular issues, problems or concerns, which may then be assigned to specific lawyers for further study and recommendations.

VII. Internal and External Communications

The Legal Department has various ways to provide internal communications to facilitate achieving its objectives. In addition to the monthly senior staff meetings, full staff meetings are generally held monthly. In addition, meetings are held as appropriate to communicate to the entire department special issues which cannot be timely addressed in staff meeting. The general counsel, as a member of AEP's Executive Council, also attends regular meetings with other members of AEP's senior management.

The Legal Department staff participates in interdepartmental meetings and also meets with their counterparts in other electric utilities or with individuals within industry associations, such as the Edison Electric Institute. Lawyers also maintain contacts with the staffs of state and federal regulatory bodies, outside counsel and experts representing other utilities.

Exhibit LD - 1 – Legal Department Organizational Chart



American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e) (ii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Services
Risk & Strategic Initiatives Department

SFR Reference

(B)(9)(e)(ii) Insurance

Information regarding insurance is covered by the Risk & Strategic Initiatives group in Section (B)(9)(b)(vii).

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
Chapter II Section (B) (9) (e) (iii)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Services

Real Estate Asset Management

SFR Reference

(B)(9)(e)(iii) Land Management

I. Policy and Goal Setting

The AEPSC Real Estate Asset Management Department organizes and directs the acquisition, sale, leasing and maintenance of all real estate owned by AEP or its subsidiary companies, including CSP and OP, doing business as AEP Ohio.

Policies and procedures related to the real estate management function provide guidance for acquiring, holding or selling real estate and are established in the Real Estate Policies and Procedures Manual, which was revised October 2010 and a copy of which is attached as Exhibit 2.

II. Strategic and Long-Range Planning

Long-range planning focuses on 3 segments:

1. training personnel and succession planning;
2. maximizing income through sales and lease income; and
3. automating processes.

Training Personnel and Succession Planning

With AEP's aging workforce and 50 being the median age of the Real Estate Asset Management Department, succession planning and cross training are essential to ensure the transfer of knowledge and skills continues as employees retire.

Maximizing Income Through Sales and Lease Income

The real estate group continually works to implement new and improved uses for land to maximize income. Identifying property that no longer is being used and has no further benefit continually is under review to determine the highest and best way to market the property for sale. The sale of non-earning assets removes the liability risks associated with ownership, eliminates holding costs and results in earnings for the company.

Lease income also has a two-fold benefit, not only creating income but holding the lessor responsible for keeping the property clean and eliminating trespass incidents. Leasing property helps remove encroachments, saving time and money that is incurred removing encroachments when the company needs to use the property again.

Automating Processes

Despite the use of computers, real estate continues to be bogged down with paper. The need to documents transactions with lease agreements, contracts, granting/taking easement, deeds and right of

entries, etc., requires many labor hours generating documents and maintaining records. Managing this paper electronically makes the documents easier to find, eliminates the need for on-site records storage, makes sharing the documents with multiple people fast and easy and improves generating documents. Real Estate Asset Management continues to work to find new ways to make the paperwork less time consuming and to automatic processes. Geographic Information Services (GIS) is allowing electronic filing of surveys and is working toward converting old paper map to digital formats.

III. Organization Structure

The Real Estate Asset Management Department is managed by the manager - Real Estate Asset Management, who reports to the director - Real Estate and Workplace Services.

The department is organized into three sections with a supervisor of real estate who is responsible for the real estate agent, supervisor of real estate records who is responsible for records management and supervisor of forestry, recreation and Geo Information who is responsible for timber management and GIS.

Department employees include the manager, three supervisors, seven agents, five clerical employees and five forestry/GIS employees. The group's organization chart is attached as Exhibit 1.

AEPSC Real Estate Asset Management is responsible for:

- purchase of real property as required for power plant sites, electrical substations, and transmission and distribution lines; and office and service building sites and land that may be required for other purposes. This process includes negotiating options, ordering title searches and surveys, and closing the transaction while keeping the appropriate business unit informed about the process;
- sale of real property after a determination is made that the property no longer is used or no longer will be required for future operations. Surplus property may result because of dismantling of retired electrical facilities, changes in or centralization of operations and excess property related to actual or anticipated use;
- acting as rental agents and property managers for all temporary surplus property until property is used or sold or maximizing the income on surplus property while ensuring the leasehold rights are maintained through effective management and oversight of leased real estate assets;
- negotiating lease of land, office space and storage as needed for company use, and administering the terms of the lease agreement as well as the payment of rents;
- negotiating easements, licenses or permits with outside parties on company-owned property;
- inspecting company properties to identify misuse, to insure best farming practices are being used and to identify safety hazards;
- maintaining contact with other company departments to insure their needs are being met;
- managing forest resources on company lands, determining location and quantities of timber suitable for harvest, and preparing contracts and arranging for harvest and sale of timber;
- maintaining records of real estate transactions along with updating inventory of company-owned lands to reflect easements granted, partial sales and additional purchases; and
- surveying and appraising property as needed.

The management of AEP Ohio properties, as well as the management of all company-owned property, is the responsibility of Real Estate Asset Management. Agents and records personnel are responsible for all companies, not just AEP Ohio.

IV. Decision-Making

The decision-making process revolves around the needs of the company. Parties involved in making decisions generally are the company officers, department managers and supervisors. Decisions made within Real Estate Asset Management relate to real estate values, property leasing, purchases, sales and general stewardship of the property. Criteria upon which decisions are based include land prices, property availability, income producing potential and the need for property by the various departments.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

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3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

VI. Controlling Process

The principal performance indicators in the effectiveness of the Real Estate Asset Management activities toward meeting its goals include:

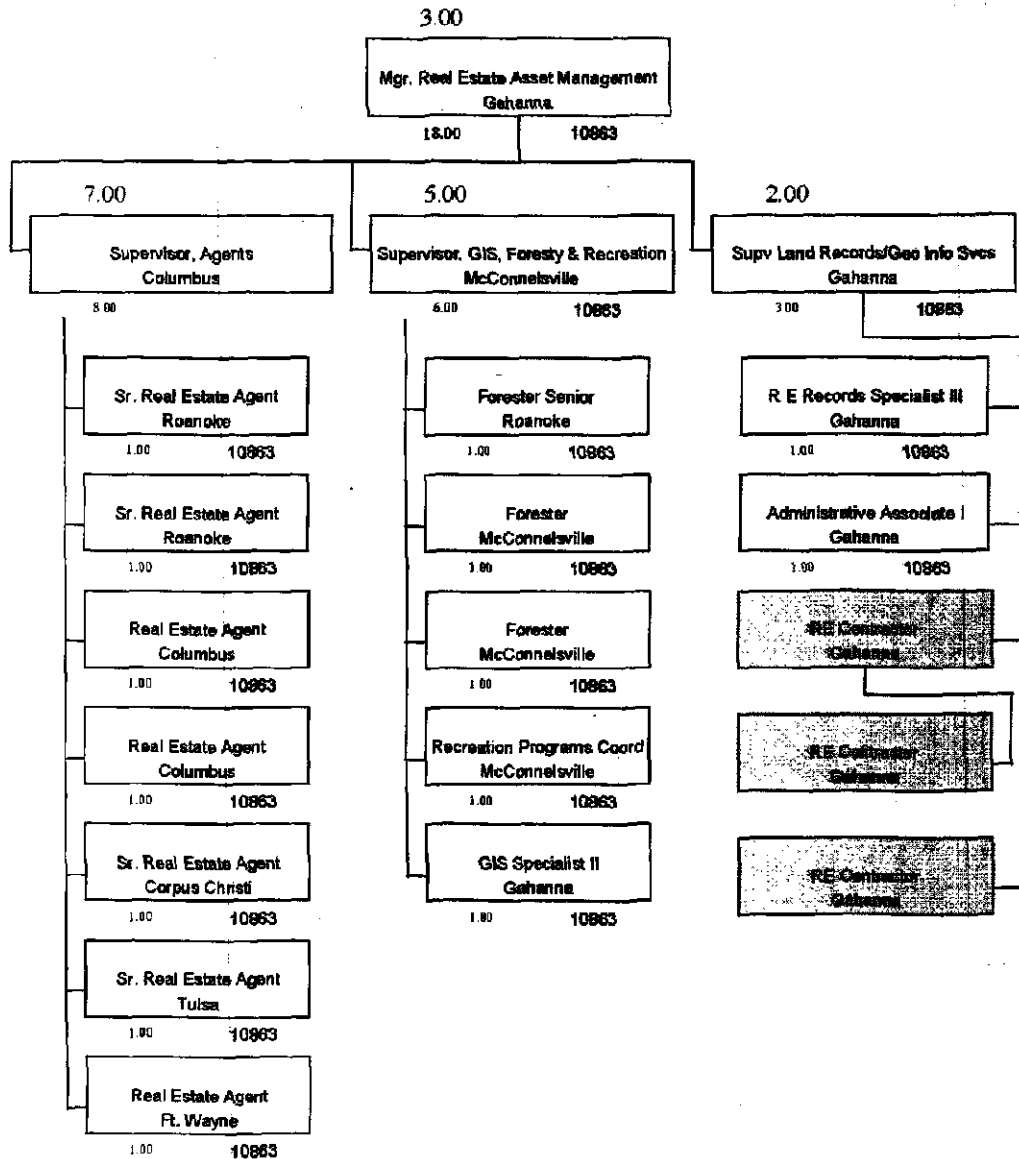
- an annual report to management that indicates revenue and expenses relating to the Real Estate Asset Management functions;
- the acquisition of property in a timely manner to provide for the construction of new facilities as may be required due to population growth and increased customer electrical load; and
- meeting budgetary guidelines are established annually by senior management. The manager prepares personnel, salary and expense budgets in accordance with guidelines. The supervisors are responsible for controlling expenditures within the approved budget. Monthly reviews are made, and explanations of deviations from the approved budget are prepared for senior management. If necessary, action is taken to reduce costs when actual costs exceed the budget.

VII. Internal and External Communications

Real Estate Asset Management maintains open channels of communication for exchange of information and ideas within each function and across functions. Internal and external communication is accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group), and internal website postings. The ability to scan and e-mail documents has made the exchange of paperwork with internal and external groups fast and inexpensive. There also are processes in place for after-hours communication among certain members of the group if needed.

Exhibit 1 – Real Estate Asset Management Organization Chart

Real Estate Asset Management



**REAL ESTATE ASSET
MANAGEMENT
POLICIES & PROCEDURES
MANUAL**

MISSION

Ensure the success of AEP and our Customers, by:

- ▶ anticipating customers' needs and exceeding their expectations
- ▶ delivering optional solutions
- ▶ providing competitive choices
- ▶ optimizing the performance of the resources we manage for AEP
- ▶ maximize income to assist with a positive return to stockholder
- ▶ manage our impacts on the environment while maximizing the positive economic, social and environmental impacts of our operations

OBJECTIVE

The objective of the Real Estate Asset Management Section is to acquire real estate and property rights for Company purposes; to manage Company real estate assets not used in operations and to realize the maximum return thereon; and to sell or dispose of properties no longer used or useful. This objective must be accomplished in accordance with American Electric Power Service Corporation policies and procedures.

Provide competitive, quickly scalable support services to our customers with a premium level of customer service.

VALUES

Real Estate Asset Management is committed to:

- ▶ holding customer service as our top priority
- ▶ environmental stewardship
- ▶ ensuring safety and health of our coworkers, our customers and the public
- ▶ continuous learning and development
- ▶ efficiency and speed
- ▶ providing an enjoyable work environment
- ▶ teamwork
- ▶ developing our commercial skills and business acumen
- ▶ rewarding talent, skills and commitment
- ▶ respecting each other, our customers and our suppliers

FOREST MANAGEMENT PROGRAM

AEP Real Estate Asset Management Department's mission is to implement a system-wide Forest Management Program following a philosophy of long-term sustained yield on all AEP forestlands. This will be accomplished by providing guidance, direction, coordination and oversight of all Company Forest Management activities.

The primary focus of the AEP Forest Management Program is to maintain the long-term productivity of existing forest assets by following a management philosophy of long-term sustained yield on property that will remain in forest cover for the foreseeable future. This philosophy maintains the forest resource in a steady state by balancing forest growth with timber harvests. Following this philosophy is not only compatible with AEP's Environmental Stewardship Policies, it is necessary for the credible reporting of active Forest Management activities under the Climate Challenge and under Section 1605(b) of EPCA 1992. AEP Forest Management Program emphasizes sound contributions to ecological and wildlife habitat, and its commitment to enhanced recreational use.

American Electric Power Company has approximately 106,000 acres of forestland under Forest Management in Ohio. With that extensive ownership comes the responsibility of stewardship to protect and care for this renewable forest resource. Many people rely on AEP's forestland for the economic and other ancillary benefits that it provides. As a large forestland owner, AEP has long recognized that it has a social obligation to manage its forests to provide a sustainable supply of raw material to local economies, as well as to provide clean air, clean water, wildlife habitat, and recreation use. AEP's Environmental Principles dictate that the management of its forests must achieve an appropriate balance of all the benefits that its forests can provide the Company and society.

Forest Management Program

The major Forestry functions that constitute AEP's Forest Management Program and that need to be performed in the management of AEP's forest assets are:

- Forest Inventory
- Forest Management
- Sound Silvicultural Practices
- Forest Management Plans
- Timber Asset Sales
- Contractor Compliance with Best Management Practices
- Contractor Compliance with Contract Provisions
- Forest Resource Appraisals
- Afforestation

Forest Inventory

In order to achieve credible knowledge of both commercial timber volumes and forest growth, all Company forest resources are inventoried by trained Forestry Personnel. The results make possible the formulation of appropriate mapping and development of Forest Management Plans that are in accordance with the philosophy of Long-Term Sustained Yield. Sustained Yield

Management is based on forest growth and this can only be derived through an inventory of the Company's forest resource.

AEP adopted a forest resource inventory plan in 1965. Intense field sampling & data collection was initiated on all Company lands in 1975. These samples were a combination of BAF-10 Variable Plot Samplings, One/tenth Acre Fixed Diameter Plots, and Observation Plots of Non-Forested areas. Data collected at these plots include:

- Mapped location of Plot (X & Y coordinates)
- Basic size class of stand (Sawtimber-Poles-Pulpwood)
- Tree species represented
- Age of Co-Dominant trees (3 trees core sampled per plot)
- Growth Rate of Co-dominant trees (3 trees sampled)
- Stocking Rate (Basal Area)
- DBH of all "countable in plot" trees
- Soil Type and projected productivity
- Site, slope, aspect
- Woody Stems reproduction- number & species
- Silvicultural Treatments and priority

Forest Management

The primary focus of the AEP Forest Management Program is to maintain the long-term productivity of existing forest assets by following a management philosophy of long-term sustained yield on property that will remain in forest cover for the foreseeable future. This philosophy maintains the forest resource in a steady state by balancing forest growth with timber harvests. Following this philosophy is not only compatible with AEP's Environmental Stewardship Policies, it is necessary for the credible reporting of active Forest Management activities under the Climate Challenge and under Section 1605(b) of EPAct 1992.

Sound Silvicultural Principles

The balance between harvests and growth will be accomplished through professional implementation of approved Forest Management plans employing sound silvicultural practices that result in the marketing and removal of timber volumes equal to or less than the forest growth for an ownership. This will not only achieve sustained yield regulation of our forest resource, but will also maximize its long term income productivity, its contribution to carbon sequestration under the Climate Challenge and reporting under Section 1605(b) of the EPAct of 1992, its contribution to ecological and wildlife habitat, and its contribution to enhanced recreational use.

Forest Management Plans

Detailed Forest Management Plans have been developed for most of the Company ownerships having significant forest resources. Forest Management Plans are ten years in duration and coordinate Forest Management Objectives with the Company use on the ownerships and are in accord with the philosophy of long-term sustained yield. These plans have been approved by all appropriate departments within the Company and the AEP System. The development and implementation of these plans are the responsibility of Land Management Foresters with oversight from AEP Land Management Department.

On small ownerships where Forest Management Plans have not been developed, the management of the resource will be in accordance with the same guidelines and principles incorporated in the Forest Management Plans for larger ownerships.

The major objectives to be achieved through Forest Management are:

1. Salvage harvests of resource threatened by Company development of its land.
2. Sustained yield management of its non-threatened forest resource.
3. Thinning and conversion of pine plantations.
4. Disposition of special products, such as firewood or locust posts, from Company land.

These Forest Management Objectives are achieved through the marking of designated timber assets following sound silvicultural practices and the resultant harvesting of the marked timber resource. Timber resource may be placed on the market and sold to achieve any of the objectives listed above. Resource to be harvested and marketed shall be marked or otherwise designated by Company Forestry Personnel.

Timber Asset Sales

Income from AEP's forest assets will be generated as the above balance is achieved through the marking of timber designated for removal from Company forest assets, as Forest Management Plans are implemented. While maximizing and increasing income from Company forests is a primary goal of the AEP Land Management Department, under the philosophy of long-term sustained yield AEP's forest assets have a natural and maximum sustainable level of income that they can generate without being degraded. That income level can only be increased if we increase and maintain our forests' productivity. Forest Management Goals determine the level of income to be generated, not vice versa. The sustainable level of income that Company forests can achieve will be determined by the Land Management Foresters, not by untrained individuals.

All resource to be removed from Company forests shall be designated by Company foresters in accordance with the philosophy of long-term sustained yield. Detailed volume estimates of the resources being sold are to be made unless the values involved do not justify such detail. The best or most appropriate method and timing for harvesting and marketing the resource will be based upon the expert recommendation of Land Management Foresters.

Two industry-wide marketing methods have been utilized in selling timber resource from Company lands, sales on the shares basis and the lump sum sales basis.

Shares Basis sales allow the purchaser to pay for the resource as it is removed and delivered to the mill location. The Company receives a percentage of the delivered mill price and the purchaser the remainder. The Company's share for both pulpwood and sawlogs is dependent upon geographic location, local market conditions, timber quality and volume. All are subject to flexibility as the timber industry markets fluctuate. Sales under this method typically occur where limited markets or special circumstances exist, where justified by poor timber quality or minimal volumes, or where determined to be more cost effective than pursuing another alternative marketing strategy.

When making a sale on a Lump Sum Basis, the Company receives a single lump sum payment for timber being sold. Sales under this method typically occur where good or excellent markets exist, or where justified by timber quality and value. Lump sum prices can be determined through appraisals by Company Foresters, solicitation of several offers, or solicitation of sealed bids.

The sale of any timber resource from Company lands requires a written Timber Sale Contract.

Timber Sale Contract

All timber sales involving the sale of sawtimber and pulpwood assets shall be under contractual agreements between the Company and the Purchaser. Such contractual agreements shall be conducted and administered under the terms and provisions contained in AEP's approved Timber Sale Contracts. Approved contracts for shares sales and lump sum sales for the appropriate state in which the timber sale is being conducted have been developed and shall be used accordingly. These contracts contain the standard hold harmless and liability clauses and require the Purchaser to carry specified levels of public liability and property damage insurance coverage. Resale of standing timber assets by the Purchaser is not permitted. The compilation of the appropriate contract is the responsibility of Company Foresters. All contracts will be approved by the appropriate level of management and be executed by an officer of the Company or by someone authorized to execute the timber sale contract on their behalf.

Disposition of Special Products

The sale of special products, such as firewood or locust posts, from Company timber sales or Company land are unique and accomplish both silvicultural and other Company objectives, and do not usually involve significant values. These are to be handled under Special Products Contracts or Permits. Harvesting firewood for personal use from material left after harvesting or from other approved areas is handled by issuance of Firewood Permit. Harvesting of firewood for resale is handled under Special Contracts. Harvesting of locust posts is typically done under the shares basis with the Company receiving 1/3 of the locust posts produced, and are handled under Special Contracts. Harvesting of locust posts for resale is handled under Special Contracts.

Contractor Requirements

AEP requires all logging contractors harvesting timber from its managed timberlands to be trained and certified under one of the following State Programs (or equivalent):

- Ohio Master Logger Company Program
- West Virginia Certified Logger Program
- Kentucky Master Logger Program
- Virginia Master Logger Program

Best Management Practices

Harvesting the timber sold shall be accomplished with due respect for protection of the land and the residual forest resources or growing stock. Best Management Practices are required by Company Timber Sale Contract provisions wherein: Purchaser agrees to follow the recommended Best Management Practices (BMP's) as available from the applicable State Division of Forestry.

1. Ohio Division of Forestry BMP's for Erosion Control on Logging Jobs
2. Virginia Department of Forestry Logger's Guide
3. West Virginia Division of Forestry Handbook for Loggers
4. Kentucky Division of Forestry Forest Practices Guidelines

Silvicultural Operation and Management Plan

In Ohio, in addition to compliance with the Ohio Division of Forestry BMP's, Company Foresters in Ohio must assure compliance with House Bill 88. Ohio House Bill 88, or The Agricultural Pollution Abatement Act, enacted in 1991, covers silvicultural operations on Ohio woodlands and requires the owner or person responsible for any silvicultural operation to submit and follow an operation and management plan (Exhibit F7) to protect the waters of the State of Ohio from NPS from silvicultural operations. This plan is to be filed with the local SWCD having jurisdiction in the county in which the silvicultural operation is occurring. The compilation, filing, and overseeing the Purchaser's compliance with this plan, shall be the responsibility of Company Foresters under the direction of the appropriate level of management.

West Virginia Logging Sediment Control Act

In West Virginia, all Company timber sales must comply with the State's Sediment Control Act. This act requires the following:

- All logging contractors must be a "Certified Logger".
- A Timber Operational Notification must be filed with the Division of Forestry for each logging operation conducted.
- All logging contractors used must have a current WV business number.

- All logging contractors used must have a current "Timbering License".

Contract Provisions and Compliance

Timber harvested under the Timber Sale Contracts requires frequent personal contacts and documentation by Company Foresters during the period the timber is being removed from Company Land. The purpose of this will be to:

1. Insure that Purchaser is in compliance with all provisions of the Timber Sale Contract.
2. Coordinate Purchaser's activities with Company's operations.
3. Control environmental impact on timber sale areas and ensure all applicable BMP standards are met.
4. Insure that cleanup and repair practices are implemented.
 - A. Grade logging roads and install water bars in the logging roads as soon as the roads are not needed, to prevent erosion;
 - B. Clear all debris from the log landing to return it to its original condition;
 - C. Seed the landing and the logging roads with a seed mixture and at an application rate as prescribed by Seller; and
 - D. Repair damage done to fence lines and other damage not normally associated with timber harvesting, which is caused by Purchaser while on Seller's site, or which is caused to the property of adjacent landowners.

Forest Resource Appraisals

Forest inventories make possible accurate appraisal evaluation of Company Forest Resources involved in donations or sale of assets. Evaluation and value appraisals of forest resources to facilitate Company objectives are necessary in a number of areas. Such appraisals and evaluations help the Company in planning, salvaging of endangered resources, payment for damaged resources, determining the market value of real estate being purchased, sold, or donated and settlement of claims for resources damaged by Company operations on private property. These areas include, among others:

1. Company development on its property
2. Real estate acquisitions
3. Real estate liquidations
4. Timber damages caused by Company operations on or to private property

Forest Resource Appraisals are conducted by Company Personnel. Such appraisals are typically in written report form and follow accepted forestry methodology. Appropriate documentation of forest appraisals will be maintained to protect the Company from liability.

Afforestation

A secondary focus of the AEP Forest Management Program is to increase, where practical and as dictated by other Company objectives, the area of our forestland through afforestation programs. The direction and supervision of planting contractors and compliance is the responsibility of Company Foresters under the direction of the AEP Land Management Department.

All Afforestation programs will include:

1. Selected areas for planting
2. Planting methods
3. Species of plantings
4. Budgeting for contract, labor, seedlings, and other associated materials
5. Supervision and assurance of contractor compliance.

American Tree Farm Program

In addition to managing all of AEP's forest ownerships under the long-term sustained yield guidelines, AEP is an active participant in the American Forest Foundation (AFF), American Tree Farm Program. This program is AFF national effort to encourage and recognize excellent forestry on private lands that are committed to sustained production of renewable forest products under a multiple use management approach.

All Company Forest Management Plans address the four elements of the Tree Farm Certification Program; wood, water, wildlife and recreation use opportunities. Since 1983, AEP has had over 99,339 acres of its Ohio forestlands certified in the Tree Farm System.

Sustainable Forestry Initiative

AEP is not an active member of the American Forest & Paper Association (AF&PF); however, its Forest Management Program adheres to the same Principles:

- Sustainable Forestry
- Responsible Practices
- Forest Health & Productivity
- Protecting Special (e.g. biologically, geologically, or historical significant) Sites
- Continuous Improvement

AEP forest management activities also follow the Implementation Guidelines for Sustainable Forestry. The Performance Measures that are required of AF&PF members are recognized as standards by which the quality of AEP's activities can also be measured. Since 1998, loggers delivering wood products harvested from AEP managed forestlands have been reviewed by various SFI Members (Mead, MeadWesvaco, Smurfit-Stone & Weyerhaeuser), as required in their procurement guidelines. Annually at least one AEP operation is included in an SFI performance audit.

SALES

Procedures for the sale of real property are as follows:

SALES PROPOSALS

1. Proposals

Agent

All proposals for the sale of real estate or easement grants must be submitted to Real Estate Records on a Proposal Form which is in the Sale Proposal Workbook (Exhibit "A") and all areas of the form should be as complete as possible. The general description area should contain the following information:

- location (Town, County, State)
- total acreage and acreage being sold
- an acquisition date
- brief history of its use and Grantee's intended use – why the property was purchased
- reasons for the sale (excess) and what was done to get best offer
- why the sale is in the Company's best interest
- easement description
- any other relevant information regarding the sale

A plat and a general location map, such as the USGS map, showing the property and any Company facilities in the approximate area should be attached to the Proposal. All existing electrical facilities will be reserved together with easement rights to operate and maintain the facilities. The Proposal should request those reviewing the proposal to indicate what rights should be reserved for any future facilities that may be planned.

Records

Real Estate Records will transfer the information from the Proposal form to the Land Proposals database in Lotus Notes (Exhibit "B"). The maps pertaining to the Proposal are scanned and, including in the database as an attachment.

2. Retirement Work Order

Agent

A retirement work order should be established for all sales. Agent should complete the Work Order Request form that is in the Sale Property Work Book and submit to Real Estate Records.

Records

The Retirement Work Order is created by Real Estate Records. Once the Work Order number is created, that number should be logged in the Land Proposals.

The Retirement Work Order should be used for expenses incurred in the sale process such as travel, appraisal, and advertising. The down payment and balance of the sale price should be credited to the work order.

3. Survey

Agent

If necessary, a survey should be done by a licensed surveyor. A plat should be included, along with the legal description. Agents should request the legal description, in electronic format, be e-mailed to Real Estate Records.

4. Appraisal

Agent

If necessary, an appraisal or brokers opinion of value by a qualified Real Estate Broker or Professional Appraiser should be made. Judgment by the Agent should be exercised to determine whether or not the estimated value of the property justifies the cost of an appraisal (usually \$5,000 or less). If the property has only minimal value, Agent may want to recommend waiver of an appraisal.

It is important that the appraiser have all available information and facts in order to prepare an accurate and useful appraisal. The appraiser should furnish a map or plat which clearly indicates the property and shows any existing facilities and conditions that may affect the value. If an easement is to be reserved, the easement area should be indicated and any restrictions noted.

If it is the Company's desire to dispose of the property in a relatively short period of time rather than an extended time span, such facts should be explained to the appraiser.

5. Environmental Assessment

Agent

Concurrent with the appraisal, an environmental audit should be performed using the Environmental Assessment form which is in the Sale Proposal Workbook. If there are any problems with the property or if the sale includes a building, Environmental Services should be contacted to conduct an inspection of the property to determine whether or not any toxic or hazardous substances are present. In the event such substances are present, appropriate action will be taken by Environmental Services to properly clean up the site or disclose the presence of hazardous substances to the prospective purchaser. If such substances do not exist, the facts will be documented in an environmental audit report in order that the Company will not be held liable for any subsequent contamination.

6. Approval Process

Mgmt

Once any revisions to the proposal and/or maps are made, the Manager of Real Estate Asset Management is notified of ready status and he will then circulate the proposal via Lotus Notes to all appropriate sections for review and recommendations. In general, they will be routed as follows:

T&D Properties

1. R/E and Workplace Svc Director
2. Distribution Planning
3. Transmission Planning
4. Transmission Line Engineering
5. Business Operations Support
6. Legal

Plant Properties

1. R/E and Workplace Svc Director
2. Plant Manager
3. Civil & Mining Engineering
4. Fossil & Hydro Production
5. Transmission Planning
6. Transmission Line Engineering

7. EVP, Env, Safety, Hlth & Facilities
8. Manager, Real Estate Asset Mgt.

7. Business Operations Support
8. Legal
9. EVP, Env, Safety, Hlth & Facilities
10. Manager, Real Estate Asset Mgt

Coal Properties

1. R/E and Workplace Svc Director
2. Fuel, Emission & Logistics
3. FEL Operations
4. Transmission Planning
5. Transmission Line Engineering
6. Legal
7. EVP, Env, Safety, Hlth & Facilities
8. Manager, Real Estate Asset Mgt

7. Sale Methods

Sale methods that have been successfully used are:

Sealed Bid — Provides for the property to be advertised and bids solicited with a minimum acceptable amount. This method is used where the property has considerable value and market appeal to a large number of potential buyers.

Negotiated Sale — Negotiations are conducted on an individual basis where the property has limited market appeal and a small number of potential buyers.

Broker Listing — This method may be the best alternative in cases where considerable promotion and advertising are needed to attract potential buyers. It could also be useful where a building is involved and numerous showings of the facility could be expected.

Public Auction — If the property has a potential high value and market appeal or contains a large of acreage, it may be advisable to consider a public auction conducted by a qualified and licensed auctioneer.

Donation — Under certain circumstances, it may be advisable and advantageous to donate property to a qualified group or governmental body. These transactions must be documented by facts that clearly show the economic and other benefits to the Company.

Records

A Charitable Contribution form, which is in the Sale Proposal Wordbook, for donated properties exceeding \$5,000 needs to be completed.

Regardless of what method is utilized, it is extremely important that the property is made available to all prospective buyers, especially to the adjacent landowners. "For Sale" signs should be erected on the property and the property should be advertised in the local newspapers where it is felt that such promotion will reasonably result in obtaining interested parties.

8. Approved Offers

Agent

If a preliminary/concept Proposal was initially submitted, a final Proposal needs to be prepared and submitted to Land Records, including referral to the Concept Proposal - any comments there may have been and the approval date. This will then go to the Real Estate Asset Management Manager and if deemed necessary to the R/E and Workplace Services Director for final approvals.

Records

Upon receiving these approvals, Real Estate Records will notify the Agent and Manager by way of e-mail.

9. Contracts

Agent

The Agent then prepares a Purchase/Sale Agreement between the Company and the Purchaser. The agreement should be prepared on the standard form, which can be found in the Sale Proposal Workbook, and contain all the agreed upon conditions and provisions such as:

- purchaser's name and address
- description of property
- sale price
- type of conveyance (limited, quit claim deed, etc.)
- reservation of electrical facilities and easement (if any)
- subject to Board Action and PSC approval (where applicable)
- closing date

It is important to clearly define any rights being reserved that are not obvious.

Agent

The Agreement should be signed by the Purchaser and the Real Estate Asset Management Manager for the Company. A minimum down payment equal to 10% percent of the sale price should be collected when the Agreement is signed. Where the sale price is less than \$300, the entire amount should be collected.

Records

The earnest money is forwarded Real Estate Records. Real Estate Records will create an invoice crediting the money to the appropriate WO and will forward the money to Accounts Receivable for deposit.

10. Deeds

Records

All conveyances for the sale of real estate should be by either a General Warranty, Limited Warranty, or a Quit Claim Deed, samples of these documents can be found in the Sale Proposal Workbook. In certain circumstances, a warranty deed may be used upon prior approval by Legal. The deeds should be made subject to:

- The lien of taxes and assessments, if any, which shall be prorated to the date of delivery of the deed.
- All easements, leases, rights of way, legal highways, restrictions, conditions and covenants, whether or not record, and to such state of facts as an accurate survey would disclose.

11. Legal

Records

Any proposal with a sale price of \$200,000 or above or which is a high profile sale/contribution shall be sent for Board of Directors Approval. Real Estate Records prepares the items listed

below and links them into LandWorks. The agreement number is forwarded to Legal so they can prepare the board item.

Sales that require Public Service Commission (PSC) approval are submitted for said approval by Legal. These are sales in West Virginia that are \$50,000 or above and sales in Kentucky that are \$1m or over.

Items prepared:

- proposed deed with surveyor's legal description
- approved proposal
- executed purchase and sale agreement
- source deed(s)
- environmental assessment
- plat or new survey

Legal will submit resolutions to the Board of Directors authorizing the sales. Legal will advise Real Estate Records when Board Action is completed.

12. Closing Transaction

Agent

A closing date can then be. At the closing, the deed is exchanged for the balance of the sale price. Processed shall be in the form of a certified check or wire. A closing statement, which can be found in the Sale Proposal Workbook is to be prepared prior to closing and signed by both Purchaser and Agent at the closing. If closing is handled through a lending institution or title company, their closing statement can be used.

Records

Closing statements are to be reviewed by Real Estate Records prior to closing. The closing statement and any proceeds should then be forwarded to Real Estate for processing.

If there is a house on the property that is included in the sale have the Lead Based Paints disclosure form signed at closing this form. can be found in the Sale Proposal Workbook

13. Filing

Records

After completion of the sale transaction, property records and LandWorks needs to be updated to reflect the sale. LandWorks is revised to show the out-conveyance with recorded copies of the deed and closing documents linked for viewing.

An invoice for the proceeds from the sale of property is created and the check is forwarded to Account Receivable for deposit

In all transactions involving reservations of easements, a copy of the deed is to be sent to the Transmission and Distribution departments in addition to the usual individuals. Prior to notifying them, it will be necessary to obtain the recording data for the deed. ***This should preferably be a copy of the actual recorded deed.*** If the name of the line or facility is known, that information should be included. The proposal file will remain open until this information is obtained and the copies sent to assure the deed is properly indexed.

Upon receipt of the final closing documents and deposit of the check the WO must be closed. A Work Order Completion Report, which can be found in the Sale Proposal Workbook, is completed and linked into LandWorks. An e-mail notification is sent to Asset Management who will close the work order booking the property into PowerPlant. Real Estate Records will make the appropriate notation in PowerPlant showing the relationship between the record in PowerPlant and the record in LandWorks.

PURCHASES

Procedures for the purchase of real property are as follows:

Purchase Process

1. Business Unit (BU) contacts Real Estate Asset Management Agent to discuss land acquisition
 - Verify that funds are available and get Project ID and Dept ID
 - Define a time line with the BU on their desired date to be on the property
 - Determine the acreage needed (this could change based upon the terrain)
 - Property location may or may not be identified by BU
2. Notify Real Estate Records of purchase by filling out the Purchase Workbook. Be sure to provide the following information.
 - Is the purchase for a new site or additional property for an existing site?
 - Provide Real Estate Records with Project ID and Dept ID so a WO can be created.
 - Real Estate Records will work with Accounting to setup asset and/or a "land" work order number using BU's accounting information
3. Agent researches public records to identify ownership of property
 - Visit neighbors to find out who owns the property
 - Go to the tax assessor's office to get information about the property
 - Get a copy of the source deed
4. Owner is contacted and negotiations begin
 - Get name(s), address, phone number(s), social security numbers, marital status, etc.
5. Option is drafted
 - Standard option form should be used, which can be found in the Purchase Workbook (Exhibit C).
 - Make sure to take option for the least amount of money
 - Option should include offer, all rights, reservations and conditions
 - Option should include any provisions
 - Order check
6. If Owner does not accept option, option is re-negotiated. If terms cannot be agreed to, Agent goes back to Step #2
7. Once the option is accepted.
 - Determine whether or not an environmental assessment is needed
 - call internal environmental to discuss
 - Request survey

- copies of survey should go to whoever is preparing the deed
 - Provide Legal with work order number and request a Matter #
 - the Matter # allows Legal to keep track of the legal expenses for the purchase
 - Title is ordered by the Legal Department
8. Title commitment is received and forward to surveyor who is instruction to identify the exceptions on an ALTA survey. One the title and survey has been reviewed and it is determined that the site is usable.
 9. Exercise Option in writing.
 10. A closing date is set with the title company
 11. Deed is drafted and approved by Legal.
 12. Upon receipt of a closing statement funds are wire transfer to the title company for closing
 13. Recorded documents are returned to Legal for review
 14. Legal forward closing document to Real Estate Records.
 15. Information is entered in LM records database (LandWorks)
 16. Pertinent documents are scanned and linked to LandWorks
 17. Work Order Completion Report is completed
 18. Electronic notification of completed acquisition transaction, along with the LandWorks agreement number are e-mailed to Owned Asset Accounting, Tax Accounting, BU, and LM Agent. The appropriate departments will pull information they need from LandWorks to complete their process.
 19. Deed file is updated or completed and returned to filing.

OUT – LEASES

Receivables

Procedures for generating new and renewal lease agreements on real property owned by AEP

LEASING

1. Lease Renewals

Records

Real Estate Records will run a report yearly on all leases that will expire during the calendar year. The report will be ran at the end of the year for the following year. The report will be ran for and send to each Agent individually and will be sorted by expiration date.

Agent

Upon receipt of the report the Agent should review the expired leases keeping in mind the location of the property and the expiration dates. After receiving the report, Agent shall contact the Tenant to discuss renegotiations of the lease and to discuss any concerns or questions there might be – either by the Agent or by the Tenant.

At the time of negotiations, it is imperative for Agent to verify all information, including conformation that the current Tenant is the actual person(s) using the property. If they Agent finds that a different person is using the property, a new Lease Information Form needs to be completed and a new lease number assigned.

Agent

It is crucial to get current contact information where the Tenant can be reached. This would include, home telephone numbers, cell phone number, work telephone number, e-mail address and mailing address. If Tenant does not have a home or work telephone number the Agent needs to obtain the name and telephone number of a relative.

2. Residential Leases

Agent

For all residential leases, the Agent should have the Tenant complete a Lease Application (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Lease Application) (Exhibit D). Agent should also complete a Lead-Based Paint Disclosure form (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Lead Based Paint Disclosure-Rentals & Leases) (Exhibit E) and give a copy of it to the Tenant along with the Lead-Based Paint form (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Lead Based Paint Disclosure-Booklet) (Exhibit F).

3. Property Inspection

Agent

When a new lease is entered into or an existing lease is renewed, the Agent should perform a property inspection to make sure that there are no encroachments, dumping issues, or any other problems with the property. Agent to complete an Inspection form (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Property Inventory) (Exhibit G). If there are any concerns, they should be noted and Agent should address the issues as soon as possible.

Property Inspections should be performed for each expired lease when the Agent is in the area. Although a lease might expire in December if the Agent is in the area in March a property inspection should be done at the time.

4. New Leases

Agent

For all New leases, the same steps will be followed as the Renewal process except the Agent will initially prepare the appropriate Lease Information Form (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Request for Lease Information)(Exhibit H) or for a Residential (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Lease Information Form - Residential)(Exhibit I) . Agent is to provide map hi-lighting the leased area or a legal description or both.

5. Lease Approval

Agent

Lease renewals need to be completed and returned to Real Estate Records 3 - 4 weeks prior to the expiration date on the lease. Once the Agent and Tenant have come to an agreement with terms and after the Agent has inspected the property, the Lease Information Form, along with any other pertinent information, should be sent to Real Estate Records. In order to expedite the lease and to avoid constant follow-up, the Lease Information form should be as complete and as accurate as possible and maps should have leased area highlighted.

If Real Estate Records has not received lease renewal information prior to the lease expiration date, a reminder will be sent to the Agent via e-mail copying the Real Estate Supervisor and Manager.

Records

After the information is received by Real Estate Records, the lease along with a cover letter is typed (H:LandMgt/Internal/REAL ESTATE PROCEDURES/Receivables/Cover Letter) (Exhibit J). The lease, in duplicate, is given to the Real Estate Asset Management Manager for final approval. Once the lease is executed, it is mailed out. Real Estate Records will make a note of the mail-out date in order to follow-up if necessary.

6. Processing Lease

Records

If lease has not been returned by Tenant within a reasonable amount of time (approximately 2-3 weeks), Real Estate Records will make attempts to collect the Lease. If unsuccessful in getting the lease returned, Real Estate Records will then notify Agent. Agent will then have to contact Tenant to collect the lease.

Once the executed lease is received, LandWorks will be updated. If this is a monetary lease, payment may be required in advance. Payment received with the lease will be processed in People Soft.

Please refer to the People Soft segment of the Out-Leases section for check processing and setting up recurring invoices.

7. Delinquencies

Records

A generic delinquency/dunning letter is automatically issued every month by the receivables group in Canton for balances exceeding \$100 and if 30-days or more past due. If Tenant does not bring the balance current or contact Real Estate Records to make payment arrangements, the

Agent will be notified. The Agent will either contact the Tenant or give instructions on sending a deadline or cancellation letter.

Real Estate Records will notify Agent and Real Estate Asset Management Manager of any habitual delinquencies. If Tenant continues to be delinquent, actions should be taken to remove Tenant.

8. General Guidelines

The lease is entered into LandWorks and hard copies are filed alphabetically by Tenant's last name.

General guidelines to follow for Out-Leases are:

Agent

- if rent is under \$100 annually, it is preferred the rent be collected in ADVANCE
- semi-annual rents is usually due in 6-month increments of each lease year (i.e., June 1st & December 1st)
- farm leases should usually run January 1st to December 31st. Crop share or large annual rentals are usually payable in arrears on or before December 1 of each lease year
- any leases that are \$50 annually or lower should be made TERM (\$150 for a three year lease) and money collected in advance
- \$1 leases should be made Free or Agent should try to collect some of the processing costs (approximately \$50 for the Term of the lease)
- it should be made clear to Tenant that any changes to the lease (term, acreage, rent, etc.), notices or cancellations should be received in writing
- a statement from the grain mill is needed for Crop Share leases
- in most cases, no security deposits are charged
- Certificate of Insurance clause is required in all leases for commercial or public use, with the exception of billboard leases, or instructed otherwise.
- Real Estate Records has a few life leases remaining with varying termination and assignment terms. Tenant should be contacted in writing to update records and terminate whenever possible

OUT – LEASES

Receivables

PEOPLESOFT

Procedures for the deposit of payments,
Creation of invoices and reporting.

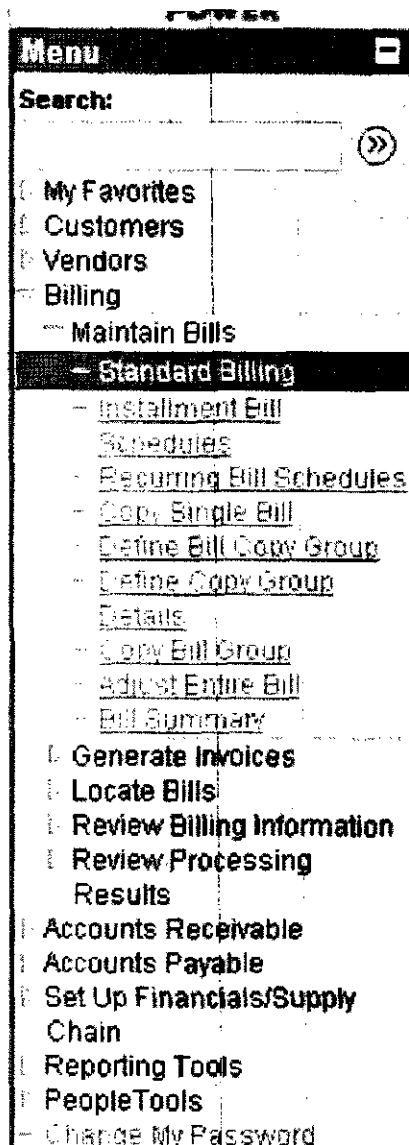
PeopleSoft -- Processing a Check

When a check is received for a lease payment – that payment is processed through PeopleSoft. An invoice must be created to receipt for the check which allows the check to be deposited while insuring that the money is getting credited correctly.

Log into PeopleSoft

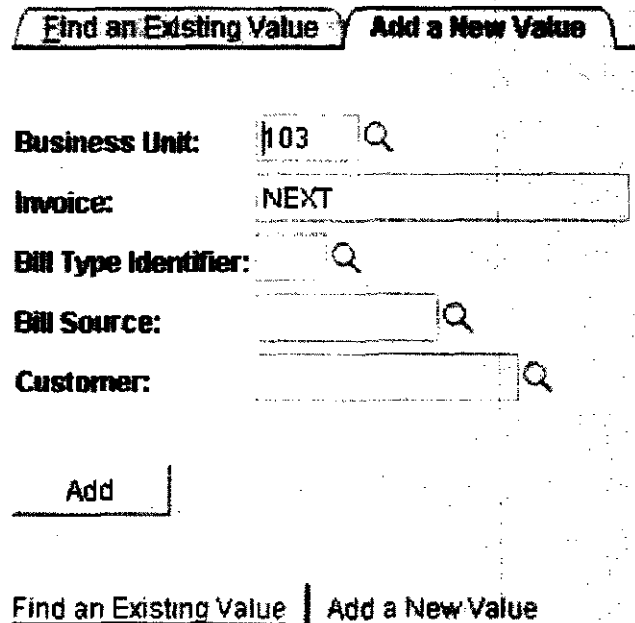
Click on the following items –

Billing
Maintain Bills
Standard Billing
Add a new Value



The screenshot shows the PeopleSoft Menu interface. At the top is a 'Menu' header with a search bar and a magnifying glass icon. Below the search bar is a list of menu items. The 'Billing' item is expanded, showing a sub-menu. The 'Standard Billing' sub-menu is further expanded, showing a list of options including 'Installment Bill Schedules', 'Recurring Bill Schedules', 'Copy Single Bill', 'Define Bill Copy Group', 'Define Copy Group Details', 'Copy Bill Group', 'Adjust Entire Bill', and 'Bill Summary'. Other menu items visible include 'My Favorites', 'Customers', 'Vendors', 'Maintain Bills', 'Generate Invoices', 'Locate Bills', 'Review Billing Information', 'Review Processing Results', 'Accounts Receivable', 'Accounts Payable', 'Set Up Financials/Supply Chain', 'Reporting Tools', 'PeopleTools', and 'Change My Password'.

Bill Entry



The screenshot shows the 'Bill Entry' form. At the top, there are two tabs: 'Find an Existing Value' and 'Add a New Value'. Below the tabs, there are several input fields with labels and search icons. The fields are: 'Business Unit' (with value '103'), 'Invoice' (with value 'NEXT'), 'Bill Type Identifier', 'Bill Source', and 'Customer'. Below these fields is an 'Add' button. At the bottom, there are two tabs: 'Find an Existing Value' and 'Add a New Value'.

type in Business Unit and click on ADD

Header – Info

Type: LEA – Leases
REV – Revenue
RFD - Refund
Customer: Enter customer number
Cycle ID: Daily
Prepaid
Special Handling
Pay Terms: Net30
PrePay
Bill Inquiry Phone: 614-883-7293
Collect: Land_Gah
Biller: Land_Gah

Address Info

Address: Verify Address

Header – Misc Info

Contract: Lease #---- or other information to identify

Header Note

Standard Note Flag: PREPAID

Line - Info 1

Table: ID
Identifier: LEA-ANNUAL / MONTHLY
Description: Default or Property Name
Qty: 1
UOM: ---
Unit Price: \$\$\$\$

Line – Tax Info

Tax Group: Lease Real
Non Taxable
Trans Type: Select from Drop Down

Line – Note

Standard: Ck #### dated ###
Special Handling

Acctg – Rev Distribution

PROJECTS
PC Business Unit: SHSVC
Project ID: SSN1000##
Work Order: G0000###
Cost Component: REV
ABM Activity: 413

Bill Line Distribution

Account: 4540002
State/Jurisdiction: State
Department: 10005
Product: S057 / S115

Scroll down and Select HEADER – INFO 1

Click in the “Status” field and type RDY

Click on SAVE

Write down the Unit-Invoice# on Check

PeopleSoft -- Setting Up Recurring Billing

Manage Sales Activities
Enter Billing Information
Use
Bill Entry
Add a New Value
• type in Business Unit and click on ADD

Header – Info

Type: LEA
Customer: #####
Cycle ID: YR-ANNUAL, MONTHLY
Pay Terms: BOM
Bill Inquiry Phone: 614-883-7178

Address Info

Address: Verify Address

Header – Misc Info

Contract: Lease #----

Line - Info 1

Table: ID
Identifier: LEA-ANNUAL / MONTHLY
Description: Default or Property Name
Qty: 1
UOM: ---
Unit Price: \$\$\$\$

Line – Tax Info

Tax Group: Lease Real
Trans Type: Rental

Line – Note

Standard: Ck ### dated ###

Acctg – Rev Distribution

PROJECTS

PC Business Unit: SHSVC
Project ID: SSN1000##
Work Order: G0000###
Cost Component: REV
ABM Activity: 413

Bill Line Distribution

Account: 4540002
State/Jurisdiction: State
Department: 10005
Product: S057 / S115.

SAVE

Scroll down and Select HEADER – INFO 1
Select RECURRING in “Frequency” field
Click on Recurring Bill Schedule
Enter a START DATE
Enter and END DATE
Check Pre-Assign Invoice Numbers
Click on the small icon to the right
SAVE
Scroll down and click on RETURN TO BILL ENTRY
Click in the “Status” field and type RDY
Click on SAVE
Write down the Unit-Invoice# on Check

PeopleSoft --Copy Bill

Billing
Maintain Bills
Copy Single Bill
Business Unit
Invoice #
Search
Select “Copy Bill” and Save
Copy Results will give new invoice number and a link to it.
Click on the link.
Change information accordingly

PeopleSoft -- Delinquency Reports

Reporting Tools
Query/Query Viewer
Search by Query Name Begins with “ARQ”
Name begins with “ARQ_ITEM_OPEN” – Open Receivables

Select HTML

Business Unit = % for all (or narrow down by BU #)

Collector = LAND_GAH

Entry Reason = % for all or narrow down by Bill Type (LEA; ROY; RFD)

Download results in Excel Spreadsheet

(if not downloading into Excel, select View All)

PeopleSoft – Customer Information

First search to see if already set up as a Customer

Customer Information

General Information

Find an existing value

Click in Name 1 and enter %Customer's name

(% for "contains")

Click on Search

If not found in list that is retrieved, click on Clear and

Select Add A New Value to create as a new customer

AEP AMERICAN ELECTRIC POWER

Menu

Search:

- My Favorites
- Customers
 - Customer Information
 - General Information**
 - Conversations
 - Review Customer Information
 - Reports
 - Contact Information
- Vendors
- Billing
- Accounts Receivable
- Accounts Payable
- Set Up Financials/Supply Chain
- Reporting Tools
- PeopleTools
- Change My Password

General Info | **Bill To Options** | **Miscellaneous General Info**

SetID: AEP Customer ID: NEXT

*Customer Status: Active

*Date Added: 12/17/2009 *Since: 12/17/2009

*Name 1:

Name 2:

Currency Code: USD Rate Type: CRRNT

☐ Bill To Customer
Bill To Selection

☐ Ship To Customer
Ship To Selection

☐ Sold To Customer
Sold To Selection

☐ Broker Customer

☐ Indirect Customer

☐ Correspondence Cust
Correspondence Selec

☐ Remit From Customer
Remit From Selection

☒ Corporate Customer
Corporate Selection

☐ Consolidation Custom

☐ Federal Customer

People Tools
Query Manager
Use
Query Manager
select Query

Business Unit: %
Customer ID: %
Posted Date From: enter date
Posted Date To: enter date
Entry Reason LEA
Collector: LAND GAH

click on View Results
click on Excel Spreadsheet
File, Save As
Name the file and change the type to Microsoft Excel

IN – LEASES

Payables

Procedures for the lease of property for AEP use,
payment for these leases and the maintenance of the records

IN-LEASES

In-Leasing

In addition to purchasing properties for Company use, there are situations where it may be more expedient or economical to lease needed land or facilities for Company use. This would especially apply where the needs are only temporary. Examples of such leasing activities would be for office and service buildings, parking facilities, garages, construction storage sites, pole storage, railroad siding and switches, radio tower and microwave sites.

Lease Provisions

Upon properly authorized requests, Real Estate Asset Management will negotiate leases and options for leases for certain specified uses.

The requests should include what facilities are required, the minimum and maximum length of time needed, and whether there should be an option to renew the lease for a specified period.

There are several important provisions of a lease that require agreement between Lessor and Lessee.

- Term – the length of the lease must be specified, together with any option period.
- Rent – the annual rental is specified, together with the method of payment, Payee's name and mailing address.
- Maintenance – the responsibility for upkeep and maintenance must be specified. The lease should state the individual responsibilities of both the Lessor and Lessee.
- Improvements – any improvements desired by Lessee should be agreed upon. It must be decided whether Lessee or Lessor will make the improvements.
- Escalation Clause – leases that extend for a period in excess of five years normally will have an escalation clause for increasing the rental due to increases in operating expenses.
- Description – an accurate description of the premises should be included in the lease.

Approval

A Lease Improvement Requisition (LIA) is required as part of the approval process for a lease where:

- the intent is to commit Company funds for more than one year or
- the commit over the life of the lease exceeds \$100,000

The Lease Improvement Requisition will be prepared and submitted for approval by the department which requested the lease and should be prepared with the same details and supporting data required for Capital Improvement Requisitions. Real Estate Asset Management

is responsible for the preparation and submission of Lease Improvement Requisitions for Workplace Services.

Leases are to be prepared on approved lease forms however for commercial buildings the owner or management firm will have their own lease form.

Leases to the Company are to be executed by the Real Estate Asset Management Manager who is the approved signer for real estate transactions.

Executed lease agreement are entered into LandWorks and the payments for these lease are generated by this software.

The flow of the lease process is as follows -

- ▶ Draft lease, amendment or letter of intent comes to Real Estate Records from any AEP department.
- ▶ A FASB test is prepared and send to Lease Accounting – amendments or renewal also need a FASB test
- ▶ A Net Present Value Spreadsheet is prepared as these numbers are needed for the FASB
- ▶ Create Project (in PeopleSoft)
- ▶ Put Project in PowerPlant
- ▶ Do Lease Project Approval Requisition and route for approval

When the Lease Project Approval Requisition is approved by the board

- ▶ Create L WO
- ▶ Set up Asset in PowerPlant
- ▶ Notify Lease Accounting and Assets & Receivables know that the asset is in PowerPlant
- ▶ The procedures allows the payment to run through PowerPlant on the 242 account

If payments over the life of the lease totals less than \$100,000 it is paid under a lease blanket notify Workplace Services who will set up an “L” work order. Work Orders and Lease Project Approval Requisition are set up for the life of the lease.

If a Lease Project Approval Requisition is not set up in PowerPlant payments needs to be made with the “L” work order using a 931 account.

FASB

If the term of the lease is less than 1 year or less than \$50,000 a FASB is not required. This test should be done as far in advance as possible but always prior to the execution of the lease agreement.

The form for the FASB can be found -

H:\Landmgt\Internal\EXCEL\Carol\Capital vs Operating Leases (Exhibit K).

Form is self-explanatory fill in the blanks

Notes are made on the side of the form regarding any information there is not a place for in the form - ie - Commitment Letter dated 1/1/11 etc - Leased space is 4,000 sq out of a 50,000 sq building,

Economic life for a building is always 30 years

Economic life for land is always 99 years

Economic life for towers is always 50 years less # of year we have already occupied

Present Value of Minimum Lease Payments comes from Net Present Value Spreadsheet Total Annual Lease Cost - a Net Present Value Spreadsheet is needed only if an Lease Improvement Requisition is needed.

Fair Market Value of Leased Property -

The Fair Market Value come from the County Auditor's web site and is the taxable value. You will be unable to determine a fair market value for towers if we are leasing space on someone else's tower and for office space where the leased space is less than 75% occupancy of the entire building.

If the fair market value cannot be determine make a not on the side of the spreadsheet explaining why.

Microsoft Excel - FASB Test for RPT - OK State Presidents Office.xls

File Edit View Insert Format Tools Data Window Help

100% Comic Sans MS 10

A38 Lease approximately 6,570 square feet in Suite 1460 in the building located at 1601 NW Expressway, Oklahoma City, Ok

	A	E	C	D	E	F	G	H	I	J	K	
1												
2	Capital Vs Operating Lease Tests											
3												
4						Amendment/Commitment	4/28/2010	Commitment letter from Lessor dated 4/28/2010				
5	Lessor or Trustee:	1601 Tower Properties, LLC					Date of Agreement:	10/1/2010				
6	Owner Participant:	no					LEA Lease ID:	9021				
7	Lessee Company:	PSO - Distribution OK State Presidents Office					Prepared By:	Joyce Leachman				
8	Title of Agreement:	Office					Approved By:	Roy A. Strawser				
9	Lease Type (Var/Fixed):	Fixed					Approved By:					
10												
11												
12	Lease Tests corresponding to FASB #13, if answer is yes to any of the 4 questions below											
13	the lease should be classified as Capital:											
14												
15	1. Does lease transfer ownership of property to the lessee at the end of the lease term?											
16												
17												
18												
19	2. Does the lease contain a bargain purchase option?											
20												
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25												
26												
27												
28												
29												
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Ready

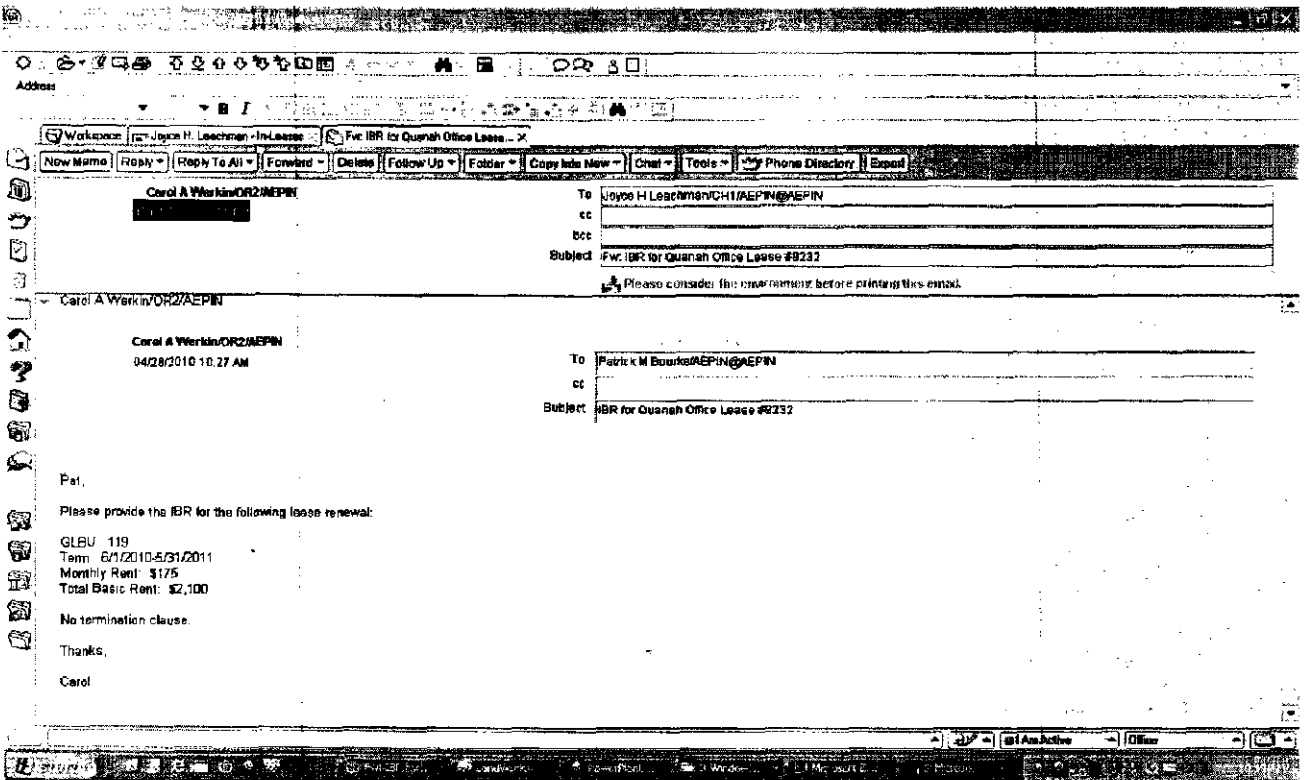
Page 1 Sec 1 101 At 5.2 Un 28 Cal 1

The % should be under 90%

This is what the detail sheet looks like

IBR (incremental borrowing rate) goes on the detail sheet for Rate – e-mail Patricia Bourke to request IBR-

IBR is only needed if we are occupying the entire property and a FMV can be determined



Fill out the detail sheet, sheet 2, which is the detail of the payments. Change the sheet to accommodate the number of payments being made. Payments are shown up to any expiration clause i.e. if lease is for 6 years but you can cancel after 3 years only show payments for 3 years.

Only take into consideration the rental amount. Charges for operating costs, parking etc are not considering in this calculation.

Here is a sample

Month	Amount
10/1/00	\$1,400.00
11/1/00	\$1,400.00
12/1/00	\$1,400.00
1/1/01	\$1,400.00
2/1/01	\$1,400.00
3/1/01	\$1,400.00
4/1/01	\$1,400.00
5/1/01	\$1,400.00
6/1/01	\$1,400.00
7/1/01	\$1,400.00
8/1/01	\$1,400.00
9/1/01	\$1,400.00
10/1/01	\$1,400.00
11/1/01	\$1,400.00
12/1/01	\$1,400.00
1/1/02	\$1,400.00
2/1/02	\$1,400.00
3/1/02	\$1,400.00
4/1/02	\$1,400.00
5/1/02	\$1,400.00
6/1/02	\$1,400.00
7/1/02	\$1,400.00
8/1/02	\$1,400.00
9/1/02	\$1,400.00
10/1/02	\$1,400.00
11/1/02	\$1,400.00
12/1/02	\$1,400.00
1/1/03	\$1,400.00
2/1/03	\$1,400.00
3/1/03	\$1,400.00
4/1/03	\$1,400.00
5/1/03	\$1,400.00
6/1/03	\$1,400.00
7/1/03	\$1,400.00
8/1/03	\$1,400.00
9/1/03	\$1,400.00
10/1/03	\$1,400.00
11/1/03	\$1,400.00
12/1/03	\$1,400.00
1/1/04	\$1,400.00
2/1/04	\$1,400.00
3/1/04	\$1,400.00
4/1/04	\$1,400.00
5/1/04	\$1,400.00
6/1/04	\$1,400.00
7/1/04	\$1,400.00
8/1/04	\$1,400.00
9/1/04	\$1,400.00
10/1/04	\$1,400.00
11/1/04	\$1,400.00
12/1/04	\$1,400.00
1/1/05	\$1,400.00
2/1/05	\$1,400.00
3/1/05	\$1,400.00
4/1/05	\$1,400.00
5/1/05	\$1,400.00
6/1/05	\$1,400.00
7/1/05	\$1,400.00
8/1/05	\$1,400.00
9/1/05	\$1,400.00
10/1/05	\$1,400.00
11/1/05	\$1,400.00
12/1/05	\$1,400.00
1/1/06	\$1,400.00
2/1/06	\$1,400.00
3/1/06	\$1,400.00
4/1/06	\$1,400.00
5/1/06	\$1,400.00
6/1/06	\$1,400.00
7/1/06	\$1,400.00
8/1/06	\$1,400.00
9/1/06	\$1,400.00
10/1/06	\$1,400.00
11/1/06	\$1,400.00
12/1/06	\$1,400.00
1/1/07	\$1,400.00
2/1/07	\$1,400.00
3/1/07	\$1,400.00
4/1/07	\$1,400.00
5/1/07	\$1,400.00
6/1/07	\$1,400.00
7/1/07	\$1,400.00
8/1/07	\$1,400.00
9/1/07	\$1,400.00
10/1/07	\$1,400.00
11/1/07	\$1,400.00
12/1/07	\$1,400.00
1/1/08	\$1,400.00
2/1/08	\$1,400.00
3/1/08	\$1,400.00
4/1/08	\$1,400.00
5/1/08	\$1,400.00
6/1/08	\$1,400.00
7/1/08	\$1,400.00
8/1/08	\$1,400.00
9/1/08	\$1,400.00
10/1/08	\$1,400.00
11/1/08	\$1,400.00
12/1/08	\$1,400.00
1/1/09	\$1,400.00
2/1/09	\$1,400.00
3/1/09	\$1,400.00
4/1/09	\$1,400.00
5/1/09	\$1,400.00
6/1/09	\$1,400.00
7/1/09	\$1,400.00
8/1/09	\$1,400.00
9/1/09	\$1,400.00
10/1/09	\$1,400.00
11/1/09	\$1,400.00
12/1/09	\$1,400.00
1/1/10	\$1,400.00
2/1/10	\$1,400.00
3/1/10	\$1,400.00
4/1/10	\$1,400.00
5/1/10	\$1,400.00
6/1/10	\$1,400.00
7/1/10	\$1,400.00
8/1/10	\$1,400.00
9/1/10	\$1,400.00
10/1/10	\$1,400.00
11/1/10	\$1,400.00
12/1/10	\$1,400.00
1/1/11	\$1,400.00
2/1/11	\$1,400.00
3/1/11	\$1,400.00
4/1/11	\$1,400.00
5/1/11	\$1,400.00
6/1/11	\$1,400.00
7/1/11	\$1,400.00
8/1/11	\$1,400.00
9/1/11	\$1,400.00
10/1/11	\$1,400.00
11/1/11	\$1,400.00
12/1/11	\$1,400.00
1/1/12	\$1,400.00
2/1/12	\$1,400.00
3/1/12	\$1,400.00
4/1/12	\$1,400.00
5/1/12	\$1,400.00
6/1/12	\$1,400.00
7/1/12	\$1,400.00
8/1/12	\$1,400.00
9/1/12	\$1,400.00
10/1/12	\$1,400.00
11/1/12	\$1,400.00
12/1/12	\$1,400.00
1/1/13	\$1,400.00
2/1/13	\$1,400.00
3/1/13	\$1,400.00
4/1/13	\$1,400.00
5/1/13	\$1,400.00
6/1/13	\$1,400.00
7/1/13	\$1,400.00
8/1/13	\$1,400.00
9/1/13	\$1,400.00
10/1/13	\$1,400.00
11/1/13	\$1,400.00
12/1/13	\$1,400.00
1/1/14	\$1,400.00
2/1/14	\$1,400.00
3/1/14	\$1,400.00
4/1/14	\$1,400.00
5/1/14	\$1,400.00
6/1/14	\$1,400.00
7/1/14	\$1,400.00
8/1/14	\$1,400.00
9/1/14	\$1,400.00
10/1/14	\$1,400.00
11/1/14	\$1,400.00
12/1/14	\$1,400.00
1/1/15	\$1,400.00
2/1/15	\$1,400.00
3/1/15	\$1,400.00
4/1/15	\$1,400.00
5/1/15	\$1,400.00
6/1/15	\$1,400.00
7/1/15	\$1,400.00
8/1/15	\$1,400.00
9/1/15	\$1,400.00
10/1/15	\$1,400.00
11/1/15	\$1,400.00
12/1/15	\$1,400.00
1/1/16	\$1,400.00
2/1/16	\$1,400.00
3/1/16	\$1,400.00
4/1/16	\$1,400.00
5/1/16	\$1,400.00
6/1/16	\$1,400.00
7/1/16	\$1,400.00
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9/1/16	\$1,400.00
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12/1/16	\$1,400.00
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10/1/17	\$1,400.00
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12/1/17	\$1,400.00
1/1/18	\$1,400.00
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3/1/18	\$1,400.00
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10/1/18	\$1,400.00
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12/1/18	\$1,400.00
1/1/19	\$1,400.00
2/1/19	\$1,400.00
3/1/19	\$1,400.00
4/1/19	\$1,400.00
5/1/19	\$1,400.00
6/1/19	\$1,400.00
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12/1/20	\$1,400.00
1/1/21	\$1,400.00
2/1/21	\$1,400.00
3/1/21	\$1,400.00
4/1/21	\$1,400.00
5/1/21	\$1,400.00
6/1/21	\$1,400.00
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10/1/21	\$1,400.00
11/1/21	\$1,400.00
12/1/21	\$1,400.00
1/1/22	\$1,400.00
2/1/22	\$1,400.00
3/1/22	\$1,400.00
4/1/22	\$1,400.00
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12/1/26	\$1,400.00
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4/1/27	\$1,400.00
5/1/27	\$1,400.00
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9/1/27	\$1,400.00
10/1/27	\$1,400.00
11/1/27	\$1,400.00
12/1/27	\$1,400.00
1/1/28	\$1,400.00
2/1/28	\$1,400.00
3/1/28	\$1,400.00
4/1/28	\$1,400.00
5/1/28	\$1,400.00
6/1/28	\$1,400.00
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12/1/28	\$1,400.00
1/1/29	\$1,400.00
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3/1/29	\$1,400.00
4/1/29	\$1,400.00
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4/1/30	\$1,400.00
5/1/30	\$1,400.00
6/1/30	\$1,400.00
7/1/30	\$1,400.00
8/1/30	\$1,400.00
9/1/30	\$1,400.00
10/1/30	\$1,400.00
11/1/30	\$1,400.00
12/1/30	\$1,400.00
1/1/31	\$1,400.00
2/1/31	\$1,400.00
3/1/31	\$1,400.00
4/1/31	\$1,400.00
5/1/31	\$1,400.00
6/1/31	\$1,400.00
7/1/31	\$1,400.00
8/1/31	\$1,400.00
9/1/31	\$1,400.00
10/1/31	\$1,400.00
11/1/31	\$1,400.00
12/1/31	\$1,400.00
1/1/32	\$1,400.00
2/1/32	\$1,400.00
3/1/32	\$1,400.00
4/1/32	\$1,400.00
5/1/32	\$1,400.00
6/1/32	\$1,400.00
7/1/32	\$1,400.00
8/1/32	\$1,400.00
9/1/32	\$1,400.00
10/1/32	\$1,400.00
11/1/32	\$1,400.00
12/1/32	\$1,400.00
1/1/33	\$1,400.00
2/1/33	\$1,400.00
3/1/33	\$1,400.00
4/1/33	\$1,400.00
5/1/33	\$1,400.00
6/1/33	\$1,400.00
7/1/33	\$1,400.00
8/1/33	\$1,400.00

Sheet 3 are the instructions – do not delete this information as it needs to remain part of the document.

Add another page to the spreadsheet and label it FMV. Attach documentation used to establish the fair market value to spreadsheet.

The FASB is approved by the Real Estate Asset Management Manager prior to being sent to Lease Account. Upon approval send by e-mail to Gregg Lutz the FASB test along with copies of leases, amendments, extensions etc... The FASB will be return back to Real Estate Records along with Lease Accountings comments and approvals.

A FASB test is required for all leases – new – renewals – amendments – any changes to the lease requires a new FASB.

Lease Project Approval Requisition

If payments over the life of the lease totals less than \$100,000 it will be paid under a lease blanket and a lease project approval requisition is not needed.

The form for the requisition can be found –

H:/Landmgt/Internal/WordPro/Carol/In Leases/Executive Summaries/201_ LIs (Exhibit L)

Fill out company name

Fill out project number

Business Line – CCO

Location – Name of facility

Project Title – Name of facility

Brief Description – Leased Property is located at (address). The leased premises consist of apprx. ___ sq. ft.

Business Reason – Discretionary

Regulatory Cost Recovery – send e-mail to Brian K West/CA1/AEPIN, Chad A Heitmeyer/OR3/AEPIN, asking them to provide the Cost Regulatory Language for GLBU _ - attached the Lease Project Approval Requisition you are creating.

Fill in Lease Start and End dates

Lease Capital to be authorized comes from the NPV spreadsheet the discounted dollars.

Fill in the cash flow from the NPV spreadsheet

Project Justification – have the agent who negotiated the lease give you this information,

Other Alternative considered – see what other alternatives were considered.

Conclusion – Summary of the request

Associated/future Projects – N/A

Project Mgt – Real Estate Asset management Manager

Req Detail provider – Real Estate Records person creating the requisition

E-mail Requisition and NPV to Jim Rosing, Workplace Services who will route for approvals
Lease Requisitions have to be approved by the board – notification will come back to Real Estate Records from CP&B and Jim Rosing once the board has approved

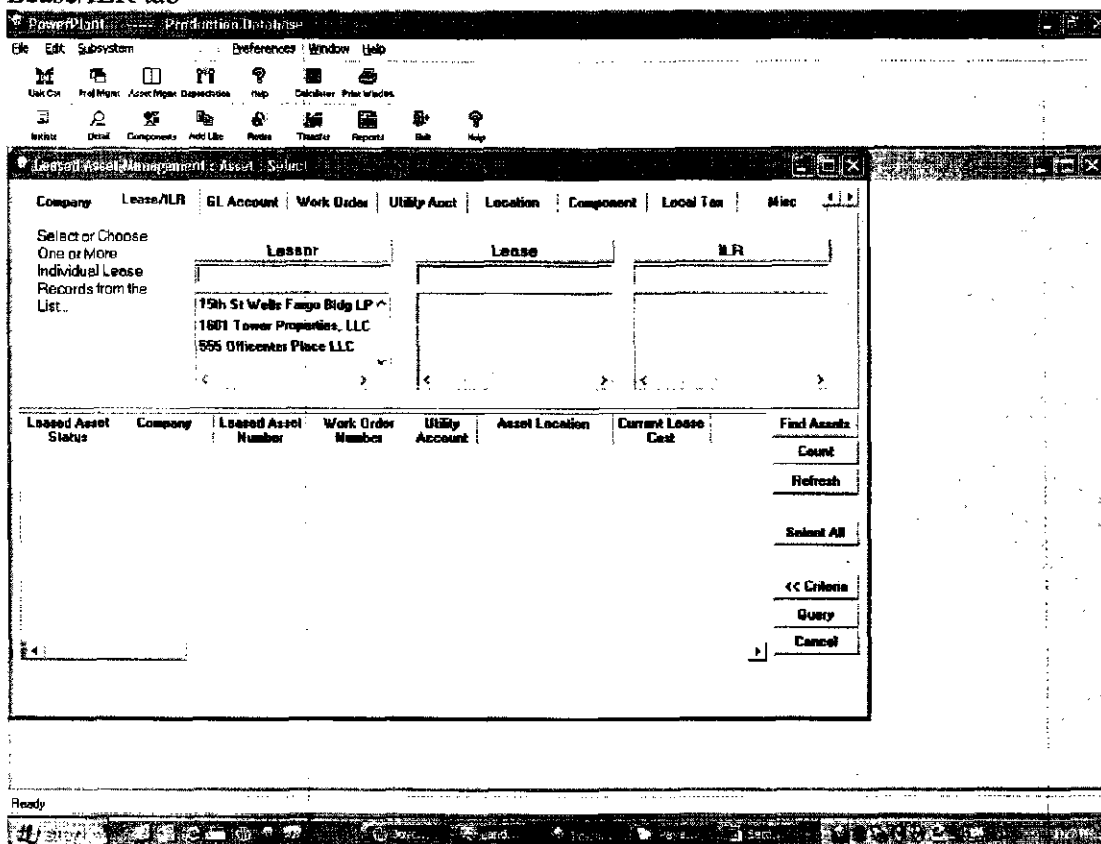
Setting up Lease Assets in PowerPlant

Asset Mgt

Lease

Asset/Comp

Lease/ILR tab



Under the Lessor tab find Lessor

Hi light the Lease
Click on Find Assets
Initiate (top left hand corner)

Leased Asset

Leased Asset ID: 1204131

Leased Asset Status: Committed

Leased Asset Number: 1204131

Description:

Long Description:

Tag Number:

External System:

External System ID:

Company:

Business Segment:

Work Order:

Funding Project Number:

Work Order Number:

Location:

Asset Location:

State:

Initiate

Cancel

Local Tax: ILR

Misc: 33917

Find Assets

Count

Refresh

Select All

<< Criteria

Query

Cancel

Description – enter the word LPM and the lease number ie.. LPM9345 and the name of facility.
Tab - description will populate in the Long Description - enter to get to a new line and enter the Lessor's name
External System – select LPM
External System ID – LPM + lease number-
Select appropriate Company
Select business segment (usually Regulated)

Work Order

Funding Project Number - SS_LBLNKT_GEN_PLT-140 (last 3 digits are company BU)
Only use this funding project on Workplace Services work order. On the "L" work orders created by Real Estate Asset Management use the project on the Lease requisition.
Select the correct WO # from drop down
Location – FIND select correct asset (Select major location of Improvements Leased Facilities – then go to the Asset Location column and start typing the name of the asset hi-lit and select).

PowerPlant Production Database

File Edit Subsystem Preferences Window Help

Unit Cost Proj Mgmt Asset Mgmt Depreciation Help Collection Print Window

Leased Asset Management - Asset - Initiate

Leased Asset ID: 1204114

Leased Asset Status: Committed

Leased Asset Number: 1204114

Description: LPM 6626 McConnellsville LM Office

Long Description: LPM 6626 McConnellsville LM Office

Tag Number: Jane Christie

External System: LPM

External System ID:

Company: Ohio Power - Dist

Business Segment: Regulated

Work Order:

Funding Project Number: es_dist_lpm_off-260

Work Order Number: 12500188

Location:

Asset Location: McConnellsville Land Management (Leased): OPLo: 3500

State: OH

Initiate

Cancel

Local Tax: ILR

Max:

10568

42145

87882

Find

Find

Find Assets

Count

Refresh

Select All

<< Criteria

Query

Cancel

Ready

System ... Land ... Power ... Settings ...

Lease Asset ID will populate-screen print or write down this number

Initiate – new screen comes up

PowerPoint - Production Database

File Edit Subsystem Preferences Window Help

Unit Cost Proj Mgmt Asset Mgmt Depreciation Help Calculator Print Window

Leased Asset Management - Asset Details

Leased Asset ID: 1284131 Time Stamp: 5/19/2010 13:51:49

ILR Number: User ID: K362239

Leased Asset Status: Committed External System: LPM

Leased Asset Number: 1284131 External System ID:

Description: LPM 18023 Tag Number:

Long Description: LPM 18023
Andy & Donna Kozuch

Property Tax Month Number (yyyy-mm): Cost: \$ 00 Residual Amount: \$ 00

Current Lease Date: Cost: \$ 00 Expected Life:

Conversion ID: Interim Interest Date: GI Posting Begin Date: Retirement Date: Termination Penalty: Sales Proceeds:

Components:

Description	Component Status	Current Lease Cost	Committed Cost	Estimate	Purchase D
Details					
Add					
Delete					

Record: 1 of 1

Ready

Search ... Landmark ... Powerline ... Estimate ...

External system ID (LPM)

External system ID - LPM + the Lease number

Fill in Property Tax Month (use correct format) (this is the start date)

Cost - total payments for the life of the lease

PowerPlant Production Database

Leased Asset Management: Asset Details

Leased Asset ID: 1204114 Time Stamp: 5/18/2010 13:16:24

ILR Number: User ID: K362238

Leased Asset Status: Committed External System: LPM

Leased Asset Number: 1204114 External System ID: LPM 8626

Description: LPM 8626 McConnellville LM Office Tag Number:

Long Description: LPM 8626 McConnellville LM Office

Property Tax Month: 201006 Cost: \$29,616.80 Residual Amount: \$0.00

Current Lease Date: Cost: \$0.00 Expected Life:

Conversion ID: Interim Interest Date: GI Posting Begin Date: Retirement Date: Termination Penalty: Sales Proceeds:

Components:

Description	Component Status	Current Lease Cost	Committed Cost	Estimate	Purchase On

Record 1 of 1

Ready

Components – add – new screen

Leased Asset Management: Component Add/Update

Component Details:

Lease Asset ID: 1204131 Time Stamp:

Lease Component ID: 1 User ID:

Description: LPM 11023

Long Description: LPM 11023 Andy & Donna Kozsich

Lease Component Status: Committed

Purchase Order:

Manufacturer:

Model:

Serial Number:

Comment:

Current Lease Cost: \$0.00

Interim Interest Begin Date: 00/00/0000

GI Posting Begin Date: 00/00/0000

Initiate

Cancel

Update

Cancel

Description: Component Status Current Lease Cost Committed Cost Estimate Purchase On

Details

Add

Record 1 of 1

Ready

Purchase Order – LPM# - Name of the Office
 Commitment – total payments for the life of the lease

Leased Asset Management: Component - Initiate

Component Details

Lease Asset ID: 1204114 Time Stamp:
 Lease Component ID: 1 User ID:
 Description: LPM 8626 McConnellville LM Office
 Long Description: LPM 8626 McConnellville LM Office
 Lease Component Status: Committed
 Purchase Order: LPM 8626 McConnellville LM Office
 Manufacturer:
 Model:
 Serial Number:
 Commitment: \$29,618.00
 Current Lease Cost:
 Initiation Internal Begin Date: 00/00/0000
 GL Posting Begin Date: 00/00/0000

Initiate Cancel

Leased Asset
 CPR Details
 Flex Fields
 Local Tax
 Dist Def
 Update
 Cancel

Description	Component Status	Current Lease Cost	Committed Cost Estimate	Purchase Order

Details Add Edit

Record 1 of 1

Initiate – takes you back a screen – go to CPR Detail Tab–

Company – FIND hi lite company OK

GL Account – hi lite 1011004 (it is always this account number) – OK

Business Segment (click on business segment button) select Regulated - OK

Under the Choose the Criteria: Utility Account – select 39000 – OK – Select

Takes you back to the previous screen

PowerPlant Production Database

Leased Asset Management - Asset Details

Leased Asset Number: 1204131 CPR Asset ID: []

Account

Company: Southwestern Electric Pwr-TX-Dist Find
Reset

GL Account: 1011004 Capital Leases-Gen_Misc

Business Segment: Regulated

Functional Class: General Plant

Utility Account: 38000 - Structures and Improvements

Sub Account: None

Dept Group: []

Work Order

Funding Project: SS_LBLNKT_GEN_PLT-161 Find
Reset

Work Order Number: L1618118

Location

Asset Location: Dargatzfield Office (Leased): SEP: 88812 Find
Reset

State: TX

Unit

Property Group: [] Find
Reset

Retirement Unit: [] Clear

Record 1 of 1

Leased Asset CPR Details

Plan Fields

Local Tax

Dist Del

Update

Cancel

Ready

Select - property group - find - new screen select
PROPERTY GROUP (select Structures and Improvements) - OK
RETIREMENT UNIT (select Structures and Improvements) (again) OK - select

PowerPlant Production Database

Leased Asset Management - Asset Details

Leased Asset Number: 1204114 CPR Asset ID: []

Account

Company: Ohio Power - Dist Find
Reset

GL Account: 1011004 Capital Leases-Gen_Misc

Business Segment: Regulated

Functional Class: General Plant

Utility Account: 38000 - Structures and Improvements

Sub Account: None

Dept Group: []

Work Order

Funding Project: SS_LBLNKT_GEN_PLT-358 Find
Reset

Work Order Number: L2500163

Location

Asset Location: McConneville Land Management (Leased): OPCA: 9508 Find
Reset

State: OH

Unit

Property Group: Structures and Improvements Find
Reset

Retirement Unit: Structures and Improvements Clear

Record 1 of 1

Leased Asset CPR Details

Plan Fields

Local Tax

Dist Del

Update

Cancel

Ready

Flex Fields tab

Leased Asset Number: 1204131
 Leased Asset ID: 1204131
 Asset Class: 15 land 16 bldg
 Rendition Switch: NO
 New/Used: NEW
 Reg. Lease Life: in months
 Time Stamp: 5/15/2010 13:51:49
 User ID: 362239
 Local Tax
 Dist Def
 Update
 Cancel
 Record 1 of 1

Asset Class – 15 land 16 bldg
 Rendition Switch – NO – always
 New/Used - NEW
 Reg. Lease Life – in months

Skip the Local tax tab

Dist Def – add – add –

Dist Department – select appropriate department (this can be found in the old account vouchers and is the department associated with the 931 accounting)

Dist GL Account 9310001

Scroll over to WO # - work order will always end in 13 always use task 13 (except on “G” work orders) this is not the “L” WO number this number will come from the old accounting associated with the 931 account information

Cost Element – Lease of real prop

Do not select asset location, state or division

Tab to Sub Cat – this is the facility number assigned by Workplace services

ABM Act 412

Benefit loc = co ID

Product code S049

Proj ID - OPBLDG

PC BU – SHSVC

Click on GL Validation (BOTTOM LEFT)
UPDATE

WRITE DOWN LEASE ASSET ID ON LEASED ASSET TAB
Close window

Refresh on the Leased Asset Mgt – Asset _ Select screen

Click on the Misc tab at the top

Select LPM in the External System

Find Asset

Hi lite the asset you are entering

Go to the top and click on Components

Leased Asset Status	Company	Leased Asset Number	Work Order Number	Utility Account	Asset Location	Current Lease Cost	Find Assets
Received	Ohio Power - Di	1204114	L2500188	39000 - St	McCombsville Land I	\$0.00 LPM	Count
In Service	Appalachian P	1203884	L1402273	39000 - St	Independence Area R	\$1,800.00 LPM	Refresh
In Service	Public Service	1203641	L1670151	39000 - St	Big Top Parking Lot (I	\$194,400.00 Big T	Select All
In Service	Southwestern E	1203277	L1590132	39000 - St	Louisiana State Office	\$206,799.96 LPM	
In Service	AEP Service C	1203267	L1035775	39000 - St	Texas State Office (le	\$2,183,769.63 LPM	

Hi Lite the component

Click on Received

PowerPlant Production Database

File Edit Subsystem Preferences Window Help

Unit Cost Print Merge Asset Merge Database Info Database Print Window

Leased Asset Management Asset Components

ILR Number:

Leased Asset ID: 1204136

Leased Asset Number: 1204136

Leased Asset Status: Committed

Description: LPM 18023 Daringfield Office

Long Description: LPM 18023 Daringfield
Andy & Donna Kozsok

Components

Description	Component Status	Current Lease Cost	Committed Cost	Estimate	Purchase Order	
LPM 18023 Daringfield	Committed	\$0.00	\$12,000.00	18023 Daringfield		Add
		\$0.00	\$12,000.00			Delete
						Details

Record 1 of 1

Find Assets

Count

Refresh

Select All

<< Criteria

Query

Cancel

Rows 1 to 1 of 1. Rows Selected: 1

YOUR DONE (X OUT OF ALL THE WINDOWS)

Sent a note to Assets & Receivables with the new Lease asset Id #

Exhibit L
LEASE PROJECT APPROVAL REQUISITION

Company:

Project Number:

Authorization
Type:

Lease Improvement

Version Number: 1

Business Line: COO

Location:

Project Title:

Brief Description:

Business Reason:

Regulatory Cost
Recovery:

Project
Dates:

Lease Start

Lease End:

Lease Capital to be Authorized	
	Lease Capital (\$)
Previously Approved Amount	0
This Submission	0
Total (\$)	0
<i>Note: For new leases, the lease capital amount to be authorized is the "sticker" price of the asset. For lease renewals, the amount to be authorized is the present value of the lease payments over the life of the lease.</i>	

Required Signatures

Authorization Limits	Title	Approver	Signature	Date
amt < \$ 10m	Director	Parlet, J.	_____	_____
\$ 10m ≤ amt < \$ 20m	President AEP Transmission or President AEP Utilities/COO/EVP		_____	_____
amt ≥ \$ 20m	Chairman, President & CEO	Morris, M.	_____	_____
CP&B Review	Director, Corporate Budgeting	Martin, J.	_____	_____

2010 O&M Budget Availability for this Authorization: \$ _____ In Budget \$ _____ Offset

If offset, indicate source and amount:

Requested future year amounts are included in or offset within the Strategic Plan O&M budget.

Cash Flow

Year	Prior Years	2010	2011	2012	Future Years	Total (\$)
Lease Capital to be Authorized		0				0
Annual Lease Payment		0	0	0	0	0
Sublease Offset		0	0	0	0	0
Balance		0	0	0	0	0

Note: Associated O & M is not approved with this requisition. Operating & Maintenance dollars, including lease payments, are assumed to be in budget or offset in the year spent.

Project Justification

Other Alternatives Considered

Conclusion

Associated / Future Projects

Project Contacts

Contact	Name	Telephone
Project Manager		
Requisition Detail Provider		

American Electric Power
Subsidiaries Columbus Southern Power Company and Ohio Power Company, DBA as AEP Ohio
Summary of Compliance with Ohio Administrative Code
SFR Reference: Chapter II Section (B) (9) (e) (iv)
Executive Summary Applicant Utilities'
Management Policies, Practices and Organization Schedule S-4.2
Administrative and Corporate Services

Real Estate & Workplace Services Department

SFR Reference

(B)(9)(e)(iv) Records Management and Workplace Services

I. Policy and Goal Setting

The AEPSC Workplace Services Department organizes and directs all aspects of workplace service functions including facility management and planning, new facility design and deployment, financial budgeting and cost management, records management, multi-functional device management, corporate travel, library services, print center management, mail and food services for AEPSC or its subsidiary companies, including CSP and OP, doing business as AEP Ohio.

Policies related to the workplace services functions provide guidance designed to increase the efficiency and productivity of personnel assigned to this function and to achieve maximum economies within the areas of the department's responsibilities with a high degree of service to other AEPSC departments, operating companies and customers.

The formation of policies, or revisions to existing policies, derives from a continual review of procedures and operations by both AEPSC and operating company Workplace Services personnel. A collaborative team approach is used to jointly analyze and discuss improvements to existing policies or formation of new policies. Typical policies addressed include:

- establishing and/or revising system guidelines for the efficient and safe management of AEPSC and operating company facilities;
- obtaining and reviewing competitive proposals;
- identifying new policies related to regulations implemented by federal and state governments; and
- identifying and implementing new policies to support AEPSC and operating company objectives.

Several criteria are used to set goals within these functions. AEPSC and operating company objectives serve as the basis for developing goals, along with external factors such as industry norms and standards and internal benchmarks based on best practices among AEP System companies.

Goals are established annually for each functional area within AEPSC. Each goal is discussed with each department manager to determine effectiveness and feasibility of successful completion. Performance management reviews are conducted annually to review progress related to goal attainment with the director - Real Estate & Workplace Services. At the end of the year, the accomplishments are analyzed and new goals established for the following year. Typical AEPSC goals include:

- collaboration and adaptability with regards to changing business objectives;
- safety performance relative to the job performed;
- energy conservation within the facilities managed; and
- budgetary and cost adherence relative to stated budget.

In addition, Workplace services personnel are assigned individual, annual performance goals as part of the standard performance management review. These goals are reviewed during the employee's annual review, and new objectives are established for the next period.

II. Strategic and Long-Range Planning

Long-range planning focuses on identifying the resources needed to effectively meet the requirements of AEPSC and operating company financial and business objectives. Requirements are defined regionally and consolidated to develop a System view of priorities. These priorities are reviewed regularly by functional experts and the director - Real Estate & Workplace Services to ensure objectives relative to budget adherence and strategic goals are being achieved. In addition, approved budgetary decisions, and capital and operating expenditures are a major element in the planning process regarding requirements in the determination of the level of activities that can be expected.

An example of long-range planning activities completed by Workplace Services is the development of a five-year forecast for the maintenance of office and service buildings. A forecast is developed for each AEPSC and operating company by using a building condition index, which provides a detailed road map for when critical building components are required to be maintained or replaced. Projects are evaluated and prioritized based on meeting the overall AEPSC and operating company objectives.

III. Organization Structure

The Workplace Services Department is managed by the director - Real Estate & Workplace Services, who reports to the executive vice president - Environment, Safety, Health & Facilities. An organizational chart of the Workplace Services Department is provided as Exhibit 1.

The department is organized into six groups. Five groups, each separately managed by a region manager - Workplace Services, are aligned with the AEPSC areas and operating companies they serve and provide facility management, mail, printing and food services. The final group, workplace programs and projects is divided into two distinct functions, workplace programs and business services. Workplace programs, under the direction of the supervisor of workplace programs, provide oversight and management of programs that are consistent across the corporation. These consist of the following services: records management, travel services, library and research services, central reprographic and convenience printing. Business services, under the direction of the supervisor of major projects and business services, provides oversight for the design and implementation of new office and service buildings, corporate engineering, and centralized budgeting and cost management.

AEPSC Workplace Services Department is responsible for centralized overseeing Workplace Services functions, aligning processes with overall goals and supporting AEP operating companies, such as AEP Ohio.

AEP Ohio Workplace Services group is responsible for carrying out Workplace Services functions and supports AEP Ohio operating units CSP and OP.

Following is an overview of each service provided by Workplace Services.

- records management is responsible for storage, retrieval, re-file, retention and the destruction review process for all physical records stored in internal and external records centers. Retention guidelines also are established and maintained. Physical storage of records for AEPSC and its subsidiary companies, such as AEP Ohio, is maintained by the records management group. Litigation guidance is provided by the AEPSC Legal Department. Records policy shown as Exhibit 2.;
- travel services is responsible for creating a cost-effective, all encompassing travel program that adheres to federal and industry guidelines and ensures the safety of AEP travelers. In addition,

travel services assists in conferences, meetings and event planning. Travel policy shown as Exhibit 3;

- library and research services is responsible for maintaining, circulating and updating resources such as books, DVDs, periodicals, subscriptions and online resource databases along with assisting in various research requests;
- mail services is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include receiving, sorting and distributing incoming external and inter-office mail, as well as small freight items from various carriers. An inter-facility courier route also is maintained within this department. Centralized oversight ensures the integrity of regionalized support as well as aligning processes with overall goals and objectives;
- print services is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include all activities necessary to produce a finished printed document as requested. Services extend to electronic file creation as well as document and/or graphic design. Centralized oversight ensures the integrity of regionalized support, as well as aligning processes with overall goals and objectives;
- convenience printing is maintained centrally within Workplace Services. It is the responsibility of this group to ensure that facilities throughout AEP are equipped with the most cost-effective print equipment that best aids in the daily function and responsibilities of the facility occupants. In addition, service and contractual adherence are monitored and enforced by this group;
- facilities management is a regionalized function that supports AEPSC and its operating companies. Primary responsibilities include ensuring AEPSC and operating company facilities are maintained and managed at a high level of operation so tenants can succeed and meet company goals; and
- food services plans, directs and supervises operations of dining facilities, food production, food service, purchasing, contracting and quality control across AEPSC and its operating companies.

IV. Decision-Making

The decision-making process for Workplace Services is handled based on the needs of AEPSC and its operating companies. Overall direction of the group is communicated by the director - Real Estate & Workplace Services. Region managers and supervisors are responsible for providing more specific guidance to employees within each of their respective organizations.

Each employee is expected to make decisions relative to their level of authority in ensuring their area of responsibility is maintained.

Financial/purchasing and contractual decisions are made in accordance with each person's level of authority by following corporate guidelines and policies while maintaining those authority levels in accordance with Sarbanes-Oxley requirements.

V. Ring Fencing

The principles of ring fencing in utility regulation were codified in various provisions of the Public Utility Holding Company Act of 1935, (PUHCA). American Electric Power Company, Inc., (AEP), was a registered public utility holding company under the PUHCA until that act was repealed in 2005. The separation of regulated utility functions from non-regulated businesses required by PUHCA and prevailing throughout the AEP system has not been altered or diluted as it relates to AEP Ohio since the repeal of

PUHCA. As a result, AEP Ohio, as constituent public utilities within the AEP system, continues to benefit from the ring fencing protections set forth in the PUHCA. In practical terms, this means that AEP Ohio:

1. has not made any investment in any entity engaged in a non-regulated business;
2. has not made loans or extended credit to AEP or to any affiliate engaged in a non-regulated business; and
3. has not guaranteed the indebtedness or the obligations of AEP or any affiliate engaged in a non-regulated business.

AEP Ohio consists of two separate legal entities, Ohio Power Company and Columbus Southern Power Company. Each AEP Ohio utility is a registered issuer under federal securities acts; each has independent access to public capital markets through which each continually raises capital. Each AEP Ohio utility is independently rated by the nationally recognized statistical credit rating agencies. Each AEP Ohio utility is managed by a board of directors that is responsible for authorizing action, including the acquisition or disposition of material assets, issuances of securities, and declaration of dividends, in such a way as to preserve the credit ratings and creditworthiness of each entity.

On June 2, 2010, the Commission approved AEP Ohio's corporate separation plans, filed June 1, 2009, and specifically found that the corporate separation plans were adequately implemented by AEP Ohio in accordance with Section 4928.17, Revised Code, Chapter 4901:1-37, O.A.C., and the orders of the Commission. (Opinion and Order in Case No. 09-464-EL-UNC). With its corporate separation plans, AEP Ohio has in place structural safeguards to ensure the independent functioning of the companies and their affiliates in a manner which is consistent with the Commission's Code of Conduct and which rejects cross-subsidization. The companies' accounting protocols, approach to financial arrangements, adherence to the Cost Allocation Manual requirements, employee education and training and internal compliance monitoring each support the goals and policies set out in Section 4928.02, Revised Code.

IV. Controlling Process

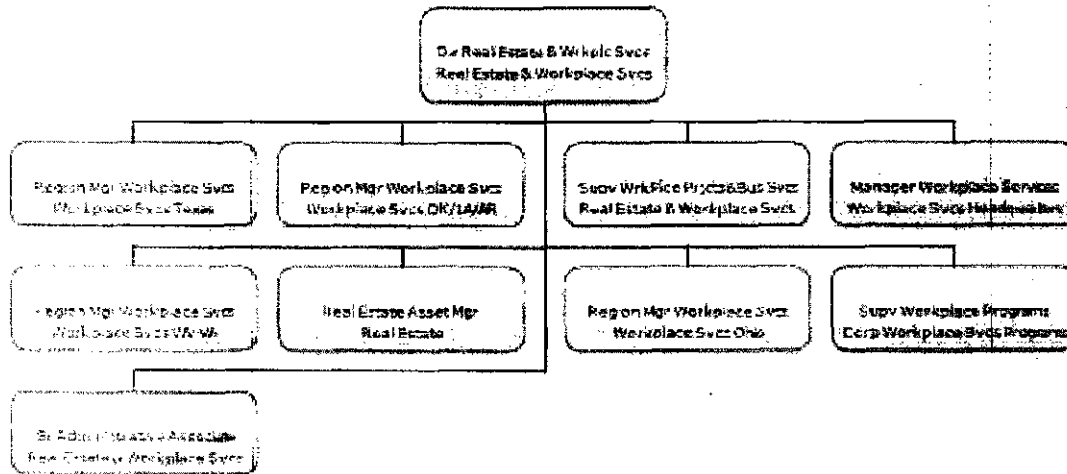
The benchmarks and performance indicators used to evaluate effectiveness of Workplace Services in controlling processes is as follows:

- the costs of providing operations and maintenance activities in servicing our facilities are benchmarked annually through the international facilities management association in order to gauge how well Workplace Services performs relative to peers;
- improvement suggestions, critiques and overall customer satisfaction are requested from Workplace Services customers on an annual basis to gauge level of performance from the customer view point. The survey results are reviewed and utilized to develop goals for improvement for the next period; and
- internal, environmental safety and health audits are conducted periodically in facilities managed by Workplace Services to ensure that policies and health requirements are met.

VII. Internal and External Communications

Internal and external communications are accomplished through a variety of media – personal and telephone conversations, meetings (face-to-face and via the web), emails (both individual and group) in order to achieve the objectives of Workplace Services.

Exhibit 1 – Workplace Services Organization Chart



American Electric Power

Travel and Entertainment

Policy Guide

June 2004

The information in this publication is subject to change and product improvement.

Copies of this and other publications can be obtained through the General Services' Travel Services department, a part of Office Services. Address comments to:

AEP Travel Services
1 Riverside Plaza, 16th Floor
Columbus, Ohio 43215
614.716.1882

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Travel and Entertainment Policy Guide

Overview

Introduction This manual provides detailed information on AEP's Travel and Entertainment Policy Guide.

In This Guide This guide contains the following topics:

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Purpose

Statement of Purpose

AEP's Travel and Entertainment (T&E) Policy is to provide employees (authorized to travel on the Company's behalf) with reasonable transportation, lodging, meals, and other services necessary to conduct official business. This policy applies only to travel and entertainment expenses. The Company's policy is also to reimburse employees for all reasonable expenses they incur on business in a timely manner.

Since every situation encountered while traveling on business cannot be anticipated, each employee shall exercise good judgment and fiscal responsibility when doing business for the Company.

Whenever possible, employees should obtain prior management approval for any expenditure not specifically covered in the policy. Exceptions to this policy require prior approval from the employee's immediate supervisor. It is the responsibility of all managers to ensure that employees who travel are aware of and adhere to this policy.

Contact Information

Any questions regarding business travel should be referred to General Services in Columbus (200.1882).

Responsibilities

Introduction

Each individual who incurs business expenses must be guided by the policies stated herein and is responsible for adhering to these policies. Individuals who are authorized to approve travel, entertainment, and related expenses are responsible for the effective administration of this T&E policy. Individuals who administer Company resources used for travel and entertainment are responsible for their proper control and accountability.

In addition to complying with each provision of this T&E policy, each employee who incurs business expenses is also responsible for obtaining the approvals required by this policy.

Employees must use the corporate credit card and the AEP travel department for all business travel arrangements.

What are my Responsibilities

It is the responsibility of each employee to ensure that an expense report is prepared and submitted for T&E business expenses incurred by them on behalf of the Company. An electronic expense report should be completed within 15 days of each business trip. An employee's immediate supervisor must approve exceptions. It is the employee's responsibility and the approving supervisor's responsibility to ensure proper accounting of expenses and to ensure that all applicable codes of conduct are followed.

Individuals responsible for administering this policy are also responsible for ensuring that their subordinates are aware of the extent and limitations of its provisions before travel and entertainment are undertaken. Furthermore, the responsible administrator must determine that the travel or entertainment is necessary to accomplish a legitimate business purpose and that the modes of transportation, type and extent of entertainment, accommodations, etc., are appropriate for that purpose.

Charging another department in an expense account other than the employee's department is not allowed. If another department wishes to pay for an expense, that department should be direct billed or an employee from that department should incur the expense. According to AEP budget control practices, expected travel and entertainment expenses should be in the budget of the department that will incur the expenses. Effective budget control and supervisory approval is accomplished in the department that incurs the expenses.

Employees who use or administer Company funds, assets, and other resources used for travel and entertainment purposes are responsible for ensuring that any use of these resources has been properly authorized, proper receipts are provided, and that adequate records are maintained to ensure that use of these resources is properly controlled and accounted for.

Corporate Charge Card

Objectives

AEP's objectives for T&E activities are to:

1. Obtain as much value as possible from travel expenditures,
2. Reduce the out-of-pocket burden employees bear from paying business-related travel expenses, and
3. Streamline the accounting process for classifying, paying, and reporting T&E expenses.

To meet these objectives, AEP has implemented NOVA (New OneCard Venture Accounting application). A major part of NOVA is the Corporate Card, a Company charge card issued to an employee to facilitate Company business. Corporate Card charges will be posted to the electronic expense reporting system of NOVA for classification. This card program is Corporate Liability/Corporate Pay and the Company pays the balance in full each month. **The Corporate Card is intended for business use only.**

Use of the Corporate Charge Card for procurement activities is governed by Corporate Supply Chain Policy.

Proper Use

See the table below for an outline of proper Corporate Card use.

Corporate Card Approval	Employees who will be traveling on Company business should obtain a Corporate Card by completing a new card application found within the Shared Services website. All employees issued a Corporate Card must ensure that the card is used <u>solely for Company business purposes</u> on their behalf. Loss of a card is to be promptly reported to the credit card issuing company and to Corporate Supply Chain at AEPHQ – 200.3189 or 200.3165.
Cash Expenditures	Some travel expenses may not be chargeable to the Corporate Card. Toll road and bridge fees, parking fees, etc. may require cash payment. For these expenses, employees may obtain a cash advance using the Corporate Card. However, these advances should be of a nominal amount. Employees should check with their supervisor/manager for specific guidelines and limits.
Personal Use	The Corporate Card is issued to an employee to facilitate <u>Company business only</u> . If a Corporate Card is inadvertently used for any personal expenses, the employee must designate these charges as personal on an electronic expense report and is liable for reimbursing the Company for these charges. Under no circumstances should the employee attempt to pay the corporate card issuing company.

General Travel Arrangements

Travel Arrangements/ AEP Travel

All reservations for airline tickets, car rentals and hotels are required to be made through AEP Travel. Booking travel exclusively through AEP Travel is essential to maximizing AEP's ability to negotiate favorable discounts with airlines and travel service providers.

AEP Travel

General Travel Information – Audinet 8.200.3332 or 8.200.3333

Toll-free – 888.237.7008

Direct – 614.716.3332

Emergency Service, US and Canada – 800.362.2547 (AEP code:SUI7A)

Emergency Service, International – [link to page](#)

Fax – 614.716.1188

Email address: aeptravel@AEP.com

AEP Travel offers an online booking system ([AEP e-travel](#)) and employees are encouraged to use this option to make travel reservations whenever possible. Access the travel web page for additional information.

Traveler Profile

Each employee will complete a Travel Profile Form, which is found on the travel web page under FORMS. The first part of the process verifies that the employee's corporate information is correct. An email will be sent to the employee within one week providing authorization to access AEP e-travel. The employee should continue to update the travel profile online with relevant business and personal information.

Access AEP e-travel to make any changes to your travel profile. Keeping your profile updated is important to ensure accurate travel reservations.

Internet Bookings

On-line booking of air, car and hotel is not allowed because:

- Internet fares are highly restrictive and lack flexibility to change/credit.
 - Emergency travel assistance and traveler tracking ability are lost.
 - Travel data collection and management reports are compromised.
 - Commissions, rebates and contract incentives are lost.
-

Air Transportation

Air Transportation

Air travel is authorized only for business destinations that require more than four hours by car, unless otherwise approved by the employee's supervisor. Due to increased time required by airport security measures and the increased cost of air travel, common sense and good judgment should be used to determine if it is more time-efficient or economical to drive or take an alternate method of transportation.

Employees are expected to use the lowest logical airfare available. Advance booking of travel is key to obtaining the lowest airfares and securing the traveler's preferred schedule. Ideally, all reservations should be made at least seven days in advance, with greater cost savings opportunities possible with fourteen or twenty-one day advance purchases.

All first class travel should have the prior written approval of an employee's supervisor.

Each manager is responsible for preventing key people from traveling on the same flight to avoid severe repercussion to the Company in the event of an accident.

International Reservations

All international travel should be in coach class unless the durations of the international flight exceed seven hours. In those cases, business class may be requested.

AEP Travel provides assistance in obtaining passports and visas. Travelers will also be advised of the proper documentation necessary for each destination. Passports and visas require 2 weeks lead-time, depending on the country of destination.

Corporate Aircraft

An employee may travel on corporate aircraft on company business with approval by a member of the Executive Council or his/her designee. The expenses for the use of corporate aircraft are billed to the requesting department via the SLA (Service Level Agreement). Refer to the Corporate Aviation policy found on the travel web page for information on corporate aircraft.

Continued on next page

Air Transportation, Continued

Air Transportation Details

See details of air transportation in the table below.

1	Obtaining the lowest logical fare may require one or more of the following: (1) Use of one-stop or connecting flights, (2) Use of alternative airport, (3) Selection of a flight within a two-hour time window (two hours on each side of the requested departure/arrival time). Refusal of a lower-cost itinerary will be indicated on exception reports and sent to appropriate business units.
2	If changes are necessary after airline tickets have been issued or while you are enroute, call AEP Travel or the 24-hour emergency service number and you will be advised of the best procedure to handle the change.
3	If you have to cancel a trip with a nonrefundable airline ticket, in most cases the value can be applied towards future travel on the same airline within one year of purchase (minus the airline's administrative fee). To maximize the value of the original ticket, apply it towards a ticket of equal or greater value. Contact AEP Travel to work this out.
4	In the event an employee loses or misplaces an airline ticket, report this loss immediately to AEP Travel so a replacement ticket can be issued. A lost ticket application will be completed by AEP Travel and forwarded to the appropriate airline for processing and reimbursement to AEP. A lost ticket fee will be incurred.
5	AEP Travel should be notified of all unused airline tickets (paper or electronic) for a refund. Tickets are negotiable documents and refunds cannot be credited until the ticket is returned to AEP Travel. Credits may not be reflected on credit card statements for up to 10 weeks.
6	Frequent flyer or other incentive programs should never influence airline choices when an acceptable alternative exists at a lower cost.
7	Occasionally, a trip may combine business and personal travel, as in the case of extending a business trip to include vacation. Prior approval by the employee's supervisor is required whenever business and personal travel is combined. On these approved trips, the cost of the airline ticket is a justifiable expense provided it does not increase the cost of airfare. If the cost of the airline ticket increases as a result of personal travel, the employee will be responsible for the cost difference. AEP Travel will inform you of the cost of the business portion of the trip and the cost of the overall trip. Employees should retain sufficient documentation for seven (7) years to support their submitted expenses in these instances, including written supervisor approval.

Continued on next page

Air Transportation, Continued

Air Transportation Details (continued)

8	<p>An employee may, with supervisory permission, extend the duration of a trip over a Saturday night to qualify for a lower airfare on condition that the additional cost of hotel, meals, and ground transportation is less than airfare savings. The employee is to expense the lesser of the following: (1) regular lowest logical fare, or (2) the lower-cost airfare with the Saturday night stay plus additional expenses including lodging, car rental, and meals. Employees should retain sufficient documentation for seven (7) years to support their submitted expenses in these instances.</p>
9	<p>Personal travel expenses for family members who accompany employees while on Company business are generally not reimbursable. AEP Travel may make personal travel arrangements; however, the related expenses must be billed directly to the employee.</p> <p>On rare occasions, there may be an explicit business necessity for spouses or other family members to accompany employees on a business trip. Travel expenses for family members will be reimbursed in this situation only if authorization has been obtained from the employee's supervisor.</p>
10	<p>AEP Travel provides assistance in obtaining passports and visas. Travelers will also be advised of the proper documentation necessary for each destination. Passports and visas require 2 weeks lead-time, depending on the country of destination.</p>

Rail Transportation

Rail Transportation For rail trips of less than six-hours duration, coach seats should be secured. A roomette or single duplex may be used on longer-distance trips. Tickets may be purchased at train stations or through AEP Travel.

Ground Transportation

Ground Transportation Travelers should use the most effective and efficient ground transportation. Enterprise Rent-a-Car provides local rental vehicles in AEP's 11 states. Call Enterprise directly to make reservations. Phone numbers are available under "Ground Transportation" in the Travel web page. Avis and Thrifty will continue to be used for all airport rentals. AEP Travel will reserve airport rentals: Hotel van, limo, and taxi services should be selected on a cost-effective basis.

Personal Car Use Employees using a personal vehicle for business purposes must maintain a safe operating vehicle that projects the appropriate Company image. Employees using personal vehicles shall have proof of sufficient insurance coverage on file with their supervisor/manager. Company requires that employees carry minimum liability insurance limits of \$100,000 / \$300,000 / \$50,000. Reimbursement will be made on a mileage basis at the appropriate rate as provided by the Internal Revenue Service. The AEP standard mileage rate is included in NOVA. Refer to the Transportation section on the Travel web page on use of personal vehicle for Company business for additional details.

Employees should check with their automobile insurance carrier to understand their personal liability for use of their personal vehicle on company business. In the event that the employee's insurance does not cover the extent of the liability, then the remaining liability will be borne by the company, however, the company will not reimburse the employee for any deductibles described in the employee's coverage.

Use of personal vehicles on company business is viewed as a convenience to the employee (in lieu of using a rental vehicle). AEP's liability coverage is secondary to the employee's personal automobile liability insurance, but does cover amounts greater than the employee's coverage (minimum limits noted above). AEP provides no collision coverage or deductible coverage for use of personal vehicles.

Continued on next page

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Ground Transportation, Continued

Car Rentals

Car rental arrangements (except local Enterprise rentals) are required to be made through AEP Travel to ensure that the applicable corporate rate will be utilized. At the car rental counter, be sure to ask for any local, promotional rates that may be in effect at the time. AEP has negotiated car rental rates with major suppliers. Employees are encouraged to plan their travel to return the rental car to the renting location to avoid unnecessary drop-off charges.

Employees should rent intermediate or mid-size cars. Arrangements for a larger vehicle may be necessary if three or more employees are traveling together or to accommodate equipment and luggage being transported.

Employees must use the Corporate card when renting to make sure they are covered for collision. (*See Collision Damage Waiver below.*)

Collision Damage Waiver

Car rental insurance should be declined for all domestic car rentals. One of the benefits of the Corporate card is that it provides the collision coverage insurance for AEP Rental Vehicles (i.e., for damage to the rental car itself). This is an extremely important benefit, as AEP **does not** provide this coverage.

Employees must use the Corporate card when renting vehicles. Otherwise, if there is damage to the rental vehicle, the employee will not be able to take advantage of the insurance benefit.

Additionally, the employee's personal automobile insurance coverage may have to respond (and cover the damage to the rental car itself), just as when an employee is driving his/her personal vehicle on Company business.

International Ground Transportation

Employees should accept all insurance coverage when renting vehicles outside of the United States.

Authorized Drivers

Only AEP employees may drive an AEP rental vehicle. AEP's car rental agreements state authorized operators of a rental vehicle as the employee signing the contract. If additional AEP employees are driving the car then they need to complete an Additional Authorized Operator Form to ensure that all drivers are insured under our Corporate card collision damage insurance program.

Continued on next page

Ground Transportation, Continued

Personal Use of Business Rental Vehicles	Employees who may be combining a scheduled vacation with a business trip may NOT use the business rental car for that purpose. The employee must return the business rental and obtain a separate rental with a new rental contract in his/her own name.
Drinking & Driving Prohibited	Operating a vehicle on company business while under the influence of alcohol or drugs is absolutely against Company policy and is prohibited. Additionally, rental and other insurance coverage may be invalidated if the driver has been drinking. The driver may be personally responsible for damages.
Refuel Rental Cars	All rental cars should be returned to the agency with a full tank of fuel since the rate charged for refueling by the car rental agency is significantly higher than at the pump.
What To Do In Case Of an Accident	<p>The following information pertains to domestic car rental. International renters should obtain this information from the rental agency when the vehicle is obtained.</p> <p><u>POLICE REPORT REQUIRED.</u></p> <ul style="list-style-type: none">• The police MUST BE NOTIFIED of any accident involving a rental car. There are no exceptions.• Do not admit fault.• Sign no statements except for the police or rental car company.
Liability: Automobile Accidents Involving Injury or Damage to the Public	<p>AEP's Risk & Insurance Management Public Liability Claim Staff will respond to, and handle, any claims <u>by the public</u> for property damage or injuries as a result of an automobile accident. Therefore, the Claim Staff <u>must be notified immediately</u> (as soon as the police have cleared the accident scene) of any automobile accident in which the AEP driver is at fault, or where it is unclear or in dispute as to the cause of the accident. If in doubt, please report the accident to your R&IM Claim staff.</p> <p>It is the responsibility of the driver of the rental vehicle (and the renter if a fellow employee was driving) to obtain the following information <u>while at the scene of the accident</u>:</p> <ul style="list-style-type: none">• Name, address and phone number of other driver(s) and any passengers• Year, make and model of other vehicle(s) involved• Extent and location of damage to other vehicle (s) involved• Name, address and phone number of any witnesses• Name, address and phone number of the police department and the report number <p><u>WHO TO CALL:</u> (1) Cherryl W. Eakins @ 614.716.2724 (cell 614.562.2237) or (2) Betsy Harris @ 614.716.1083 (cell 614.580.6792)</p>

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Ground Transportation, Continued

Collision Damage

AEP **does not** provide coverage for the rental vehicle itself, and damage to the rental car itself is not handled by AEP's Risk & Insurance Management Public Liability Claim Staff.

Rather, it is the responsibility of the employee who rented the vehicle to coordinate this process with the rental company and the Corporate MasterCard insurance department.

Filing the Claim for Damage to the Rental Car

All AEP employees received the "Guide to Benefits: MasterCard Corporate Payment Solutions Guide to Benefits" when they received their corporate MasterCard.

The following information, taken from that Guide, explains (the basics of) what the employee must do in order to file the insurance claim with the Corporate MasterCard for repairs to the rental vehicle. It is found on the bottom, left hand side of Page 2 of the Guide.

1. *Call 1.800.MC.ASSIST to obtain a claim form. You must report the claim within 30 days of the incident or we will not be able to honor your claim.*
 2. *Complete and sign the claim form. Attach all documentation, including a copy of:*
 - a. *Your MasterCard receipt*
 - b. *The rental agreement (front and back)*
 - c. *An accident report or the police report*
 - d. *The repair estimate from the rental company*
 - e. *The rental company's Fleet Utilization Log if 'Loss of use' is claimed*
 3. *Submit documents to the MasterCard Assistance Center within 90** days of the incident, or the claim will not be honored. (**Note: The rental company will not wait 90 days for their money-submit this ASAP.)*
-

Continued on next page

Ground Transportation, Continued

Local Car Rentals

Enterprise Rent-A-Car Company provides local rental vehicles to employees for business purposes. The Enterprise Rent-A-Car agreement covers all Enterprise locations in AEP's 11 states and adjoining states. Employees, with their supervisor's approval, will still have the option of using an appropriate personal vehicle for business purposes and receiving a mileage reimbursement equal to the current IRS standard mileage rate. At airports, due to a negotiated corporate rate, employees traveling on business should continue to use Avis or Thrifty.

The following are required when renting an Enterprise vehicle:

- AEP corporate code number: **K95514**
- Driver's license number of person renting
- AEP OneCard number
- Business Address
- Office phone number

Insurance Coverage Note: AEP's OneCard (MasterCard) provides a collision damage waiver for most vehicles rented from Enterprise using the AEP OneCard. Vehicles not covered under the AEP OneCard program are covered by the Enterprise Collision Damage Waiver.

Refer to the Fleet website or the Travel website for additional information. Reservations are to be made directly with Enterprise.

Car Expenses

Expenses incurred as a result of a traffic violation are not reimbursable.

Parking fees and toll charges are reimbursable expenses.

Expenditures that cannot be charged to the Corporate Card should be paid in cash, and settlement will take place through the expense reporting process. Reimbursements may be made to the employee's account via direct deposit.

Lodging

Accommodations /Reservations	Reservations for overnight accommodations are to be made at moderately priced hotels within a reasonable distance from the travel destination. Preferred AEP hotels are listed in the Hotel Database found by accessing the Travel web page.
Making Hotel Reservations	Hotel reservations are required to be made through the AEP Travel Department. Booking through one source will enable us to negotiate volume rates. Travelers should choose moderately priced hotels. Preferred AEP hotels are listed in the Hotel Database found by accessing the Travel web page.
Billing	Employees should arrange to pay their hotel bill at checkout. Payment is required to be made utilizing the AEP corporate card. A copy of the hotel bill and payment receipt must be maintained and submitted to Accounts Payable.
Cancellations	Employees are responsible for canceling a hotel reservation that has been guaranteed for late arrival or for notifying AEP Travel to cancel the reservation. A record of all such cancellations, referring to the cancellation number and name of the hotel employee taking the cancellation, should be kept for a minimum of 90 days to resolve any "no show" disputes.
Convention or Seminar Bookings	Employees may book through a convention or seminar's housing bureau to obtain the convention/seminar discount. Employees will advise AEP Travel of the hotel name/address, so the information can be added to their reservation record.

Telephone Charges

Business and Personal Telephone Charges	<p>Employees who travel should obtain an AEP Power Calling Card for business use. To obtain a calling card, an employee's supervisor should contact Corporate Supply Chain at AEPHQ at 200.3189.</p> <p>Employees are reminded to use the Company audinet phone system to conduct Company business whenever possible.</p> <p>A personal telephone call to an employee's home may be made daily when that employee is out of town on Company business. Calls are to be of moderate length advising family members of safe arrival, estimated arrival time back home, etc.</p>
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Business Meals

Overview

In general, meal expenses are reimbursable when the employee is on overnight travel status. Where possible, employees shall use their Corporate Card for meal costs. Employees should select restaurants that are reasonably priced for the locality and conducive to the purpose of business to be conducted. Employees are not to charge meals that are lavish or otherwise extravagant.

Meal expenses may also be charged if the expenses incurred are for business entertainment purposes or for meals while working overtime. Individual luncheon expenses incurred on other than overnight trips are not to be charged except when incurred while dining with others for business purposes. Employees should check with their supervisor for specific guidelines.

Meals Among Employees

Employees at the same location are not to entertain one another at the Company's expense. However, if it is necessary for a group of employees to dine together for business purposes, the cost of these meals can be charged. Prior approval for these types of meals should be obtained from the appropriate supervisor. The highest level employee should assume responsibility for the total expense. That employee must list the names, titles, and business units of the other employees and the reason for the payment.

Meal Tips and Other Gratuities

Tips may be included as part of the total meal cost. As a guideline, 15 percent of the total bill is considered an acceptable tip. Other gratuities can be included when confined to reasonable limits as determined by the services required and received.

Laundry Service

Expenses Associated With Laundry Service

Laundry and cleaning/valet service expenses for business trips consisting of five or more consecutive days should be charged to a Corporate Card. Laundry and cleaning expenses must be reasonable and not exorbitant.

Business Entertainment

Business Entertainment Expenses

Each employee will need to review with their supervisor the specific guidelines and procedures for business entertainment as it applies to their business unit. These instructions will provide guidance in making reasonable, informed, and ethical decisions regarding these types of expenses.

Most business entertainment will consist of business lunches and dinners. Employees providing these meals should make sure expenses are reasonable and not extravagant. This entertainment should not become repetitious or excessive with the same party. Care should be exercised in the frequency of using a lunch or dinner to discuss business with customers.

If other types of entertainment--like theater or sporting event tickets--are provided, caution must be used so these will not be construed to improperly influence or raise questions as to the intended effect on the recipient. In particular, if the entertainment were to involve government employees, violations of the law could come into effect.

Travel or entertainment involving political candidates or public office holders requires prior review by the Legal Department. Under no circumstances will any travel or entertainment be accorded to persons actively campaigning for federal, state, or local office.

Business Gifts

Acceptable business gift amounts that are given and received are clarified in the AEP Code of Conduct. Gifts should be nominal and have approval from the business unit manager.

Per Diem Allowances

Per Diem Allowances

Employees temporarily assigned to locations or areas remote from their home office may, with the endorsement of the associated department supervisor, request a per diem allowance in lieu of accounting for expenses as incurred. The per diem allowance will be determined on the basis of recent cost experience in the area of temporary assignment, and must be approved in advance by a department supervisor. The per diem allowance must not exceed IRS guidelines. IRS per diem rates can be found by accessing the IRS web page at www.policyworks.gov.

Spouse/Family Expenses as Authorized Business Expenses

Spouse/Family Expense as Authorized Business Expenses	Expenses incurred by spouses (or other family members) accompanying employees on Company business will be reimbursed only if there is an explicit business necessity for their presence with the employee, and written authorization has been obtained from immediate supervisor.
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Travel Club Memberships

Travel Club Memberships	The Company will not reimburse dues or fees for memberships in first class, executive or "red carpet" airline clubs or any other travel clubs.
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Non-Reimbursable Expenses

Non-Reimbursable Expenses	<p>The following list is not all-inclusive; however, these expenses are usually considered non-reimbursable. Any exceptions or unusual circumstances should be detailed on the electronic expense report, and must be approved by the employee's immediate supervisor.</p> <ul style="list-style-type: none">• Personal Care Items• Barber/Hair Stylist• Shoe Shine• Toiletries• Personal Entertainment• Books/Magazines• Sporting Events• Theater Tickets• Personal Losses• Baby Sitting• Gifts• Pet Care• Personal Property Insurance• Travel Insurance
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Note: Losses of a personal nature, sustained as a result of travel on Company business, are not reimbursable. The traveler should notify the airline, car rental agency, or hotel and employee's personal insurance carrier as soon as the loss/damage occurs.

Personal Business

Personal Business

Occasionally, a trip may combine personal and Company business purposes. In such instances, the Company will reimburse all properly authorized, business-related expenses; all additional expenses in excess of what would otherwise have been charged for purely business purposes will be borne by the employee.

Group and Meeting Travel

Group and Meeting Travel

Any business unit planning to sponsor meeting travel or that has a group of 10 or more people traveling to the same destination should contact our Travel & Event Planning Coordinator at audinet 200.1882. Refer to the travel web page, meeting section, for additional information.

Miscellaneous

Miscellaneous Expenses

Minor expenses of a business nature, not normally incurred by an employee except when traveling and not specifically covered elsewhere in this guide, will be reimbursed. These expenses must be explained on the electronic expense report.

Documentation

Proper Documentation

Travel and/or entertainment expenses must be documented by submitting an expense report. Receipts for all lodging and foreign travel expenses, and individual cash expenditures of \$75 or more must be maintained seven (7) years. Only the required receipts (Hotel/Motel stays, single expenditures over \$75, all international travel) are to be mailed with the receipts cover sheet to accounts payable in Canton, OH.

VAT Reclaim Value Added Taxes may be “reclaimed” for certain business expenses incurred overseas, particularly in Europe and Canada.

International travelers must save original receipts for the following business expenses: lodging, entertainment, gasoline, meals, car rentals, rail travel, conferences, trade shows, and training courses.

All receipts must be submitted within 15 days upon return with the traveler’s expense report. Only original, itemized receipts are acceptable for VAT reclaim purposes. Charge/credit card receipts are not acceptable. Send expense reports and all international receipts to 301 Cleveland Ave, S.W.; 3rd Floor, Canton, OH 44702-1623.

Travel and Entertainment Forms

Corporate Card Request An employee designated to receive a Corporate Card must complete a Corporate Card Request Form and submit it to their immediate supervisor for approval. Once approved, the form must be sent to procurement services for processing. The online Corporate Card Request Form is found on AEPNOW under the Credit Card Center.

Electronic Expense Report Electronic expense reports should be completed within 15 days after expenses have been incurred except as specified in Section 2. The completed expense report must be electronically submitted as designated by the employee’s business unit procedures. The online expense form is found on AEPNOW under NOVA expense reporting.

All expenses reported should be detailed by day except for: 1) airline and rail transportation which should be reported with the first day’s expenses and 2) car rental charges which should be noted on the day the billing is rendered to the employee.

Daily expenses should be itemized by motel or hotel charges including taxes, meal expenses including tips, local transportation, telephone calls, etc.

Traveler Profiles Each traveler should complete a Travel Profile Form, which is found on the Travel Web page under FORMS. Access AEP e-travel to make any changes to your travel profile. Keeping your profile updated is important to ensure accurate travel reservations.

Exhibit 3 – Records Retention Policy

[illegible]

[illegible]

AEP Records Retention Manual as of 12/30/16									
Form Number	Section of Code	Record Type	Record #	Comment on	Regulatory Citation	Agreement Period	Notes	Comments	
11 C 01 04	11 CORPORATE	G. Contract and Agreements (contracts provided for clients etc.)	04	Contracts are entered into with individual employees before the company is incorporated or before the company is incorporated in the state of New York. The company is incorporated in the					

[illegible]

AEP Records Retention Manual as of 12/26/10							
Agency	Record Code	Plan or Type	Amount or	Description	Regulatory Citation	Due or Return Period	Comments
01. GENERAL ACCOUNTING	01. GENERAL ACCOUNTING	1. General Accounts	16	Collective bargaining agreements	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	02. GENERAL ACCOUNTING	2. General Accounts	17	Employee benefits	29 CFR 1201.103	3 years	
	03. GENERAL ACCOUNTING	3. General Accounts	18	Wages and salaries	29 CFR 1201.103	3 years	
	04. GENERAL ACCOUNTING	4. General Accounts	19	Wages and salaries	29 CFR 1201.103	3 years	
	05. GENERAL ACCOUNTING	5. General Accounts	20	Wages and salaries	29 CFR 1201.103	3 years	
	06. GENERAL ACCOUNTING	6. General Accounts	21	Wages and salaries	29 CFR 1201.103	3 years	
	07. GENERAL ACCOUNTING	7. General Accounts	22	Wages and salaries	29 CFR 1201.103	3 years	
	08. GENERAL ACCOUNTING	8. General Accounts	23	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	24	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	25	Wages and salaries	29 CFR 1201.103	3 years	
02. GENERAL ACCOUNTING	02. GENERAL ACCOUNTING	2. General Accounts	26	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	03. GENERAL ACCOUNTING	3. General Accounts	27	Wages and salaries	29 CFR 1201.103	3 years	
	04. GENERAL ACCOUNTING	4. General Accounts	28	Wages and salaries	29 CFR 1201.103	3 years	
	05. GENERAL ACCOUNTING	5. General Accounts	29	Wages and salaries	29 CFR 1201.103	3 years	
	06. GENERAL ACCOUNTING	6. General Accounts	30	Wages and salaries	29 CFR 1201.103	3 years	
	07. GENERAL ACCOUNTING	7. General Accounts	31	Wages and salaries	29 CFR 1201.103	3 years	
	08. GENERAL ACCOUNTING	8. General Accounts	32	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	33	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	34	Wages and salaries	29 CFR 1201.103	3 years	
	03. GENERAL ACCOUNTING	03. GENERAL ACCOUNTING	3. General Accounts	35	Wages and salaries	29 CFR 1201.103	
04. GENERAL ACCOUNTING		4. General Accounts	36	Wages and salaries	29 CFR 1201.103	3 years	
05. GENERAL ACCOUNTING		5. General Accounts	37	Wages and salaries	29 CFR 1201.103	3 years	
06. GENERAL ACCOUNTING		6. General Accounts	38	Wages and salaries	29 CFR 1201.103	3 years	
07. GENERAL ACCOUNTING		7. General Accounts	39	Wages and salaries	29 CFR 1201.103	3 years	
08. GENERAL ACCOUNTING		8. General Accounts	40	Wages and salaries	29 CFR 1201.103	3 years	
09. GENERAL ACCOUNTING		9. General Accounts	41	Wages and salaries	29 CFR 1201.103	3 years	
10. GENERAL ACCOUNTING		10. General Accounts	42	Wages and salaries	29 CFR 1201.103	3 years	
11. GENERAL ACCOUNTING		11. General Accounts	43	Wages and salaries	29 CFR 1201.103	3 years	
12. GENERAL ACCOUNTING		12. General Accounts	44	Wages and salaries	29 CFR 1201.103	3 years	
04. GENERAL ACCOUNTING	04. GENERAL ACCOUNTING	4. General Accounts	45	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	05. GENERAL ACCOUNTING	5. General Accounts	46	Wages and salaries	29 CFR 1201.103	3 years	
	06. GENERAL ACCOUNTING	6. General Accounts	47	Wages and salaries	29 CFR 1201.103	3 years	
	07. GENERAL ACCOUNTING	7. General Accounts	48	Wages and salaries	29 CFR 1201.103	3 years	
	08. GENERAL ACCOUNTING	8. General Accounts	49	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	50	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	51	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	52	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	53	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	54	Wages and salaries	29 CFR 1201.103	3 years	
05. GENERAL ACCOUNTING	05. GENERAL ACCOUNTING	5. General Accounts	55	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	06. GENERAL ACCOUNTING	6. General Accounts	56	Wages and salaries	29 CFR 1201.103	3 years	
	07. GENERAL ACCOUNTING	7. General Accounts	57	Wages and salaries	29 CFR 1201.103	3 years	
	08. GENERAL ACCOUNTING	8. General Accounts	58	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	59	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	60	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	61	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	62	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	63	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	64	Wages and salaries	29 CFR 1201.103	3 years	
06. GENERAL ACCOUNTING	06. GENERAL ACCOUNTING	6. General Accounts	65	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	07. GENERAL ACCOUNTING	7. General Accounts	66	Wages and salaries	29 CFR 1201.103	3 years	
	08. GENERAL ACCOUNTING	8. General Accounts	67	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	68	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	69	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	70	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	71	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	72	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	73	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	74	Wages and salaries	29 CFR 1201.103	3 years	
07. GENERAL ACCOUNTING	07. GENERAL ACCOUNTING	7. General Accounts	75	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	08. GENERAL ACCOUNTING	8. General Accounts	76	Wages and salaries	29 CFR 1201.103	3 years	
	09. GENERAL ACCOUNTING	9. General Accounts	77	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	78	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	79	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	80	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	81	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	82	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	83	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	84	Wages and salaries	29 CFR 1201.103	3 years	
08. GENERAL ACCOUNTING	08. GENERAL ACCOUNTING	8. General Accounts	85	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	09. GENERAL ACCOUNTING	9. General Accounts	86	Wages and salaries	29 CFR 1201.103	3 years	
	10. GENERAL ACCOUNTING	10. General Accounts	87	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	88	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	89	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	90	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	91	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	92	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	93	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	94	Wages and salaries	29 CFR 1201.103	3 years	
09. GENERAL ACCOUNTING	09. GENERAL ACCOUNTING	9. General Accounts	95	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	10. GENERAL ACCOUNTING	10. General Accounts	96	Wages and salaries	29 CFR 1201.103	3 years	
	11. GENERAL ACCOUNTING	11. General Accounts	97	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	98	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	99	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	100	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	101	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	102	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	103	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	104	Wages and salaries	29 CFR 1201.103	3 years	
10. GENERAL ACCOUNTING	10. GENERAL ACCOUNTING	10. General Accounts	105	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	11. GENERAL ACCOUNTING	11. General Accounts	106	Wages and salaries	29 CFR 1201.103	3 years	
	12. GENERAL ACCOUNTING	12. General Accounts	107	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	108	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	109	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	110	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	111	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	112	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	113	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	114	Wages and salaries	29 CFR 1201.103	3 years	
11. GENERAL ACCOUNTING	11. GENERAL ACCOUNTING	11. General Accounts	115	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	12. GENERAL ACCOUNTING	12. General Accounts	116	Wages and salaries	29 CFR 1201.103	3 years	
	13. GENERAL ACCOUNTING	13. General Accounts	117	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	118	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	119	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	120	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	121	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	122	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	123	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	124	Wages and salaries	29 CFR 1201.103	3 years	
12. GENERAL ACCOUNTING	12. GENERAL ACCOUNTING	12. General Accounts	125	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	13. GENERAL ACCOUNTING	13. General Accounts	126	Wages and salaries	29 CFR 1201.103	3 years	
	14. GENERAL ACCOUNTING	14. General Accounts	127	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	128	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	129	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	130	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	131	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	132	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	133	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	134	Wages and salaries	29 CFR 1201.103	3 years	
13. GENERAL ACCOUNTING	13. GENERAL ACCOUNTING	13. General Accounts	135	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	14. GENERAL ACCOUNTING	14. General Accounts	136	Wages and salaries	29 CFR 1201.103	3 years	
	15. GENERAL ACCOUNTING	15. General Accounts	137	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	138	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	139	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	140	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	141	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	142	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	143	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	144	Wages and salaries	29 CFR 1201.103	3 years	
14. GENERAL ACCOUNTING	14. GENERAL ACCOUNTING	14. General Accounts	145	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	15. GENERAL ACCOUNTING	15. General Accounts	146	Wages and salaries	29 CFR 1201.103	3 years	
	16. GENERAL ACCOUNTING	16. General Accounts	147	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	148	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	149	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	150	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	151	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	152	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	153	Wages and salaries	29 CFR 1201.103	3 years	
	23. GENERAL ACCOUNTING	23. General Accounts	154	Wages and salaries	29 CFR 1201.103	3 years	
15. GENERAL ACCOUNTING	15. GENERAL ACCOUNTING	15. General Accounts	155	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	16. GENERAL ACCOUNTING	16. General Accounts	156	Wages and salaries	29 CFR 1201.103	3 years	
	17. GENERAL ACCOUNTING	17. General Accounts	157	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	158	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	159	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	160	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	161	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	162	Wages and salaries	29 CFR 1201.103	3 years	
	23. GENERAL ACCOUNTING	23. General Accounts	163	Wages and salaries	29 CFR 1201.103	3 years	
	24. GENERAL ACCOUNTING	24. General Accounts	164	Wages and salaries	29 CFR 1201.103	3 years	
16. GENERAL ACCOUNTING	16. GENERAL ACCOUNTING	16. General Accounts	165	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	17. GENERAL ACCOUNTING	17. General Accounts	166	Wages and salaries	29 CFR 1201.103	3 years	
	18. GENERAL ACCOUNTING	18. General Accounts	167	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	168	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	169	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	170	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	171	Wages and salaries	29 CFR 1201.103	3 years	
	23. GENERAL ACCOUNTING	23. General Accounts	172	Wages and salaries	29 CFR 1201.103	3 years	
	24. GENERAL ACCOUNTING	24. General Accounts	173	Wages and salaries	29 CFR 1201.103	3 years	
	25. GENERAL ACCOUNTING	25. General Accounts	174	Wages and salaries	29 CFR 1201.103	3 years	
17. GENERAL ACCOUNTING	17. GENERAL ACCOUNTING	17. General Accounts	175	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	18. GENERAL ACCOUNTING	18. General Accounts	176	Wages and salaries	29 CFR 1201.103	3 years	
	19. GENERAL ACCOUNTING	19. General Accounts	177	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	178	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	179	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	180	Wages and salaries	29 CFR 1201.103	3 years	
	23. GENERAL ACCOUNTING	23. General Accounts	181	Wages and salaries	29 CFR 1201.103	3 years	
	24. GENERAL ACCOUNTING	24. General Accounts	182	Wages and salaries	29 CFR 1201.103	3 years	
	25. GENERAL ACCOUNTING	25. General Accounts	183	Wages and salaries	29 CFR 1201.103	3 years	
	26. GENERAL ACCOUNTING	26. General Accounts	184	Wages and salaries	29 CFR 1201.103	3 years	
18. GENERAL ACCOUNTING	18. GENERAL ACCOUNTING	18. General Accounts	185	Wages and salaries	29 CFR 1201.103	3 years	Company (or union) pays discrepancies regularly (if at all)
	19. GENERAL ACCOUNTING	19. General Accounts	186	Wages and salaries	29 CFR 1201.103	3 years	
	20. GENERAL ACCOUNTING	20. General Accounts	187	Wages and salaries	29 CFR 1201.103	3 years	
	21. GENERAL ACCOUNTING	21. General Accounts	188	Wages and salaries	29 CFR 1201.103	3 years	
	22. GENERAL ACCOUNTING	22. General Accounts	189	Wages and salaries	29 CFR 1201.103	3 years	
	23. GENERAL ACCOUNTING	23. General Accounts	190	Wages and salaries	29 CFR 1201.103	3 years	
	24. GENERAL ACCOUNTING	24. General Accounts	191	Wages and salaries	29 CFR 1201.103	3 years	
	25. GENERAL ACCOUNTING	25. General Accounts	192	Wages and salaries	29 CFR 1201.103	3 years	
	26. GENERAL ACCOUNTING	26. General Accounts	193	Wages and salaries	29 CFR 1201.103	3 years	
	27. GENERAL ACCOUNTING	27. General Accounts	194				

AEP Records Retention Map as of 12/20/18

Record Title	Record Type	Record ID	Description	Regulatory Citation	Retention Period	Final Record	Comments
03 C 01 03 PLANT AND DEPRECIATION	C. Plant and Machinery in Process Under a Work Order and Supplier's Record	01	Work orders to which design and drawings for removal and installation movement and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 C 02 03 PLANT AND DEPRECIATION	C. Plant and Machinery in Process Under a Work Order and Supplier's Record	02	As-built drawings of utility plant including interconnecting lines for the replacement of and addition to the plant and the results of the work	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 C 03 03 PLANT AND DEPRECIATION	C. Plant and Machinery in Process Under a Work Order and Supplier's Record	03	Regulation of replacement work orders	NRC 10 CFR 20.101	10 years	No	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 D 01 03 PLANT AND DEPRECIATION	D. Inventory and Distribution of Items in Process and Materials	01	Inventory and distribution of items in process and materials including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 E 01 03 PLANT AND DEPRECIATION	E. As-built drawings of utility plant including interconnecting lines for the replacement of and addition to the plant and the results of the work	01	As-built drawings of utility plant including interconnecting lines for the replacement of and addition to the plant and the results of the work	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 E 02 03 PLANT AND DEPRECIATION	E. As-built drawings of utility plant including interconnecting lines for the replacement of and addition to the plant and the results of the work	02	As-built drawings of utility plant including interconnecting lines for the replacement of and addition to the plant and the results of the work	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 F 01 03 PLANT AND DEPRECIATION	F. Projected Maps and Reproductions	01	Projected maps and reproductions of utility plant including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 G 01 03 PLANT AND DEPRECIATION	G. Engineering Records	01	Engineering records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 G 02 03 PLANT AND DEPRECIATION	G. Engineering Records	02	Engineering records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 G 03 03 PLANT AND DEPRECIATION	G. Engineering Records	03	Engineering records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 H 01 03 PLANT AND DEPRECIATION	H. Contract and Other Agreements Relating to Utility Records	01	Contract and other agreements relating to utility records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 H 02 03 PLANT AND DEPRECIATION	H. Contract and Other Agreements Relating to Utility Records	02	Contract and other agreements relating to utility records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 I 01 03 PLANT AND DEPRECIATION	I. Records of Utility Plant Records	01	Records of utility plant records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.
03 J 01 03 PLANT AND DEPRECIATION	J. Depositions and Copies of Utility Records	01	Depositions and copies of utility records including drawings and results in utility plant accessible for use at plant site	NRC 10 CFR 20.101	10 years	Yes	Records of plant design and drawings are retained until the plant is decommissioned or the plant is transferred to another owner.

[illegible]

[illegible]

ALP Records Retention Manual as of 2/3/2010

[illegible]

1. The first step is to identify the problem. In this case, the problem is that the company is not meeting its sales targets.

AEP Records Retention Manual as of 12/3/2010[illegible]

AEP Records Retention Manual as of 2/2/2010							
MS System	Record Source	Record Type	Record #	Description	Regulatory Citation	Disposition Period	Comments
06 B 02	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	02	Adviser of complaint made when information was known transmitted to other records, which was not stated	NAPIC 21.02(1)	destroy at option after completion of appeal and independent assessments	No
06 B 03	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	03	Station with letter dependency depicting the details of a work order that was not followed (signature and telephone area) (release)	NAPIC 21.03(1)	destroy at option after completion of appeal and independent assessments	No
06 B 04	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	04	Based on non-compliance papers	NAPIC 21.04(1)	destroy at option after completion of appeal and independent assessments	No
06 B 05	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	05	Station with letter based on release of records	NAPIC 21.05(1)	destroy at option after completion of appeal and independent assessments	No
06 B 06	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	06	Check station report and another records of service issued	NAPIC 21.06(1)	3 years	No
06 B 07	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	07	Correspondence and records made relating to forwarding of payment of half charges on the issuance of duplicate checks	NAPIC 21.07(1)	Destroy at option after completion of appeal and independent assessments	No
06 C 01	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	01	Only on other records delivery with of receipt as delivery of letter	NAPIC 21.01(1)	destroy at option after completion of appeal and independent assessments	No
06 C 02	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	02	Records of station of regarding complaints records on the (release and not processed)	NAPIC 21.02(1)	3 years	No
06 C 03	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	03	Records of non-compliance with service and delivery of letter	NAPIC 21.03(1)	destroy at option after completion of appeal and independent assessments	No
06 C 04	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	04	Records of non-compliance with service and delivery of letter	NAPIC 21.04(1)	destroy at option after completion of appeal and independent assessments	No
06 A 01	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	01	Records of non-compliance with service and delivery of letter	NAPIC 21.01(1)	3 years	No
06 A 02	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	02	Records of non-compliance with service and delivery of letter	NAPIC 21.02(1)	3 years	No
06 A 03	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	03	Records of non-compliance with service and delivery of letter	NAPIC 21.03(1)	3 years	No
06 A 04	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	04	Records of non-compliance with service and delivery of letter	NAPIC 21.04(1)	3 years	No
06 A 05	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	05	Records of non-compliance with service and delivery of letter	NAPIC 21.05(1)	3 years	No
06 A 06	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	06	Records of non-compliance with service and delivery of letter	NAPIC 21.06(1)	3 years	No
06 A 07	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	07	Records of non-compliance with service and delivery of letter	NAPIC 21.07(1)	3 years	No
06 A 08	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	08	Records of non-compliance with service and delivery of letter	NAPIC 21.08(1)	3 years	No
06 A 09	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	09	Records of non-compliance with service and delivery of letter	NAPIC 21.09(1)	3 years	No
06 A 10	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	10	Records of non-compliance with service and delivery of letter	NAPIC 21.10(1)	3 years	No
06 A 11	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	11	Records of non-compliance with service and delivery of letter	NAPIC 21.11(1)	3 years	No
06 A 12	06 TRCAGL PIV	06 Records of Complaints with Service and Closure	12	Records of non-compliance with service and delivery of letter	NAPIC 21.12(1)	3 years	No

AGEP Records Retention Manual as of 12/3/2010

[illegible]

APP Records Retention Manual as of 12/3/2016

Agency Use Only	Record Subtype	Record Type	Item and #	Description	Regulating City (in)	Retention Period	Comments	
07.F.01-07.F.23 07.F.01 07.F.02 07.F.03 07.F.04 07.F.05 07.F.06 07.F.07 07.F.08 07.F.09 07.F.10 07.F.11 07.F.12 07.F.13 07.F.14 07.F.15 07.F.16 07.F.17 07.F.18 07.F.19 07.F.20 07.F.21 07.F.22 07.F.23	07.F.01.01 07.F.01.02 07.F.01.03 07.F.01.04 07.F.01.05 07.F.01.06 07.F.01.07 07.F.01.08 07.F.01.09 07.F.01.10 07.F.01.11 07.F.01.12 07.F.01.13 07.F.01.14 07.F.01.15 07.F.01.16 07.F.01.17 07.F.01.18 07.F.01.19 07.F.01.20 07.F.01.21 07.F.01.22 07.F.01.23	07.F.01.01.01 07.F.01.01.02 07.F.01.01.03 07.F.01.01.04 07.F.01.01.05 07.F.01.01.06 07.F.01.01.07 07.F.01.01.08 07.F.01.01.09 07.F.01.01.10 07.F.01.01.11 07.F.01.01.12 07.F.01.01.13 07.F.01.01.14 07.F.01.01.15 07.F.01.01.16 07.F.01.01.17 07.F.01.01.18 07.F.01.01.19 07.F.01.01.20 07.F.01.01.21 07.F.01.01.22 07.F.01.01.23	07.F.01.01.01.01 07.F.01.01.01.02 07.F.01.01.01.03 07.F.01.01.01.04 07.F.01.01.01.05 07.F.01.01.01.06 07.F.01.01.01.07 07.F.01.01.01.08 07.F.01.01.01.09 07.F.01.01.01.10 07.F.01.01.01.11 07.F.01.01.01.12 07.F.01.01.01.13 07.F.01.01.01.14 07.F.01.01.01.15 07.F.01.01.01.16 07.F.01.01.01.17 07.F.01.01.01.18 07.F.01.01.01.19 07.F.01.01.01.20 07.F.01.01.01.21 07.F.01.01.01.22 07.F.01.01.01.23	07.F.01.01.01.01.01 07.F.01.01.01.01.02 07.F.01.01.01.01.03 07.F.01.01.01.01.04 07.F.01.01.01.01.05 07.F.01.01.01.01.06 07.F.01.01.01.01.07 07.F.01.01.01.01.08 07.F.01.01.01.01.09 07.F.01.01.01.01.10 07.F.01.01.01.01.11 07.F.01.01.01.01.12 07.F.01.01.01.01.13 07.F.01.01.01.01.14 07.F.01.01.01.01.15 07.F.01.01.01.01.16 07.F.01.01.01.01.17 07.F.01.01.01.01.18 07.F.01.01.01.01.19 07.F.01.01.01.01.20 07.F.01.01.01.01.21 07.F.01.01.01.01.22 07.F.01.01.01.01.23	07.F.01.01.01.01.01.01 07.F.01.01.01.01.01.02 07.F.01.01.01.01.01.03 07.F.01.01.01.01.01.04 07.F.01.01.01.01.01.05 07.F.01.01.01.01.01.06 07.F.01.01.01.01.01.07 07.F.01.01.01.01.01.08 07.F.01.01.01.01.01.09 07.F.01.01.01.01.01.10 07.F.01.01.01.01.01.11 07.F.01.01.01.01.01.12 07.F.01.01.01.01.01.13 07.F.01.01.01.01.01.14 07.F.01.01.01.01.01.15 07.F.01.01.01.01.01.16 07.F.01.01.01.01.01.17 07.F.01.01.01.01.01.18 07.F.01.01.01.01.01.19 07.F.01.01.01.01.01.20 07.F.01.01.01.01.01.21 07.F.01.01.01.01.01.22 07.F.01.01.01.01.01.23	07.F.01.01.01.01.01.01.01 07.F.01.01.01.01.01.01.02 07.F.01.01.01.01.01.01.03 07.F.01.01.01.01.01.01.04 07.F.01.01.01.01.01.01.05 07.F.01.01.01.01.01.01.06 07.F.01.01.01.01.01.01.07 07.F.01.01.01.01.01.01.08 07.F.01.01.01.01.01.01.09 07.F.01.01.01.01.01.01.10 07.F.01.01.01.01.01.01.11 07.F.01.01.01.01.01.01.12 07.F.01.01.01.01.01.01.13 07.F.01.01.01.01.01.01.14 07.F.01.01.01.01.01.01.15 07.F.01.01.01.01.01.01.16 07.F.01.01.01.01.01.01.17 07.F.01.01.01.01.01.01.18 07.F.01.01.01.01.01.01.19 07.F.01.01.01.01.01.01.20 07.F.01.01.01.01.01.01.21 07.F.01.01.01.01.01.01.22 07.F.01.01.01.01.01.01.23	07.F.01.01.01.01.01.01.01.01 07.F.01.01.01.01.01.01.01.02 07.F.01.01.01.01.01.01.01.03 07.F.01.01.01.01.01.01.01.04 07.F.01.01.01.01.01.01.01.05 07.F.01.01.01.01.01.01.01.06 07.F.01.01.01.01.01.01.01.07 07.F.01.01.01.01.01.01.01.08 07.F.01.01.01.01.01.01.01.09 07.F.01.01.01.01.01.01.01.10 07.F.01.01.01.01.01.01.01.11 07.F.01.01.01.01.01.01.01.12 07.F.01.01.01.01.01.01.01.13 07.F.01.01.01.01.01.01.01.14 07.F.01.01.01.01.01.01.01.15 07.F.01.01.01.01.01.01.01.16 07.F.01.01.01.01.01.01.01.17 07.F.01.01.01.01.01.01.01.18 07.F.01.01.01.01.01.01.01.19 07.F.01.01.01.01.01.01.01.20 07.F.01.01.01.01.01.01.01.21 07.F.01.01.01.01.01.01.01.22 07.F.01.01.01.01.01.01.01.23	
	07.F.24	07.F.24.01	07.F.24.01.01	07.F.24.01.01.01	07.F.24.01.01.01.01	07.F.24.01.01.01.01	07.F.24.01.01.01.01	07.F.24.01.01.01.01
	07.F.25	07.F.25.01	07.F.25.01.01	07.F.25.01.01.01	07.F.25.01.01.01.01	07.F.25.01.01.01.01	07.F.25.01.01.01.01	07.F.25.01.01.01.01
	07.F.26	07.F.26.01	07.F.26.01.01	07.F.26.01.01.01	07.F.26.01.01.01.01	07.F.26.01.01.01.01	07.F.26.01.01.01.01	07.F.26.01.01.01.01
	07.F.27	07.F.27.01	07.F.27.01.01	07.F.27.01.01.01	07.F.27.01.01.01.01	07.F.27.01.01.01.01	07.F.27.01.01.01.01	07.F.27.01.01.01.01
	07.F.28	07.F.28.01	07.F.28.01.01	07.F.28.01.01.01	07.F.28.01.01.01.01	07.F.28.01.01.01.01	07.F.28.01.01.01.01	07.F.28.01.01.01.01
	07.F.29	07.F.29.01	07.F.29.01.01	07.F.29.01.01.01	07.F.29.01.01.01.01	07.F.29.01.01.01.01	07.F.29.01.01.01.01	07.F.29.01.01.01.01
	07.F.30	07.F.30.01	07.F.30.01.01	07.F.30.01.01.01	07.F.30.01.01.01.01	07.F.30.01.01.01.01	07.F.30.01.01.01.01	07.F.30.01.01.01.01
	07.F.31	07.F.31.01	07.F.31.01.01	07.F.31.01.01.01	07.F.31.01.01.01.01	07.F.31.01.01.01.01	07.F.31.01.01.01.01	07.F.31.01.01.01.01
	07.F.32	07.F.32.01	07.F.32.01.01	07.F.32.01.01.01	07.F.32.01.01.01.01	07.F.32.01.01.01.01	07.F.32.01.01.01.01	07.F.32.01.01.01.01
07.F.33	07.F.33.01	07.F.33.01.01	07.F.33.01.01.01	07.F.33.01.01.01.01	07.F.33.01.01.01.01	07.F.33.01.01.01.01	07.F.33.01.01.01.01	
07.F.34	07.F.34.01	07.F.34.01.01	07.F.34.01.01.01	07.F.34.01.01.01.01	07.F.34.01.01.01.01	07.F.34.01.01.01.01	07.F.34.01.01.01.01	
07.F.35	07.F.35.01	07.F.35.01.01	07.F.35.01.01.01	07.F.35.01.01.01.01	07.F.35.01.01.01.01	07.F.35.01.01.01.01	07.F.35.01.01.01.01	
07.F.36	07.F.36.01	07.F.36.01.01	07.F.36.01.01.01	07.F.36.01.01.01.01	07.F.36.01.01.01.01	07.F.36.01.01.01.01	07.F.36.01.01.01.01	
07.F.37	07.F.37.01	07.F.37.01.01	07.F.37.01.01.01	07.F.37.01.01.01.01	07.F.37.01.01.01.01	07.F.37.01.01.01.01	07.F.37.01.01.01.01	
07.F.38	07.F.38.01	07.F.38.01.01	07.F.38.01.01.01	07.F.38.01.01.01.01	07.F.38.01.01.01.01	07.F.38.01.01.01.01	07.F.38.01.01.01.01	
07.F.39	07.F.39.01	07.F.39.01.01	07.F.39.01.01.01	07.F.39.01.01.01.01	07.F.39.01.01.01.01	07.F.39.01.01.01.01	07.F.39.01.01.01.01	
07.F.40	07.F.40.01	07.F.40.01.01	07.F.40.01.01.01	07.F.40.01.01.01.01	07.F.40.01.01.01.01	07.F.40.01.01.01.01	07.F.40.01.01.01.01	
07.F.41	07.F.41.01	07.F.41.01.01	07.F.41.01.01.01	07.F.41.01.01.01.01	07.F.41.01.01.01.01	07.F.41.01.01.01.01	07.F.41.01.01.01.01	
07.F.42	07.F.42.01	07.F.42.01.01	07.F.42.01.01.01	07.F.42.01.01.01.01	07.F.42.01.01.01.01	07.F.42.01.01.01.01	07.F.42.01.01.01.01	
07.F.43	07.F.43.01	07.F.43.01.01	07.F.43.01.01.01	07.F.43.01.01.01.01	07.F.43.01.01.01.01	07.F.43.01.01.01.01	07.F.43.01.01.01.01	
07.F.44	07.F.44.01	07.F.44.01.01	07.F.44.01.01.01	07.F.44.01.01.01.01	07.F.44.01.01.01.01	07.F.44.01.01.01.01	07.F.44.01.01.01.01	
07.F.45	07.F.45.01	07.F.45.01.01	07.F.45.01.01.01	07.F.45.01.01.01.01	07.F.45.01.01.01.01	07.F.45.01.01.01.01	07.F.45.01.01.01.01	
07.F.46	07.F.46.01	07.F.46.01.01	07.F.46.01.01.01	07.F.46.01.01.01.01	07.F.46.01.01.01.01	07.F.46.01.01.01.01	07.F.46.01.01.01.01	
07.F.47	07.F.47.01	07.F.47.01.01	07.F.47.01.01.01	07.F.47.01.01.01.01	07.F.47.01.01.01.01	07.F.47.01.01.01.01	07.F.47.01.01.01.01	
07.F.48	07.F.48.01	07.F.48.01.01	07.F.48.01.01.01	07.F.48.01.01.01.01	07.F.48.01.01.01.01	07.F.48.01.01.01.01	07.F.48.01.01.01.01	
07.F.49	07.F.49.01	07.F.49.01.01	07.F.49.01.01.01	07.F.49.01.01.01.01	07.F.49.01.01.01.01	07.F.49.01.01.01.01	07.F.49.01.01.01.01	
07.F.50	07.F.50.01	07.F.50.01.01	07.F.50.01.01.01	07.F.50.01.01.01.01	07.F.50.01.01.01.01	07.F.50.01.01.01.01	07.F.50.01.01.01.01	
07.F.51	07.F.51.01	07.F.51.01.01	07.F.51.01.01.01	07.F.51.01.01.01.01	07.F.51.01.01.01.01	07.F.51.01.01.01.01	07.F.51.01.01.01.01	
07.F.52	07.F.52.01	07.F.52.01.01	07.F.52.01.01.01	07.F.52.01.01.01.01	07.F.52.01.01.01.01	07.F.52.01.01.01.01	07.F.52.01.01.01.01	
07.F.53	07.F.53.01	07.F.53.01.01	07.F.53.01.01.01	07.F.53.01.01.01.01	07.F.53.01.01.01.01	07.F.53.01.01.01.01	07.F.53.01.01.01.01	
07.F.54	07.F.54.01	07.F.54.01.01	07.F.54.01.01.01	07.F.54.01.01.01.01	07.F.54.01.01.01.01	07.F.54.01.01.01.01	07.F.54.01.01.01.01	
07.F.55	07.F.55.01	07.F.55.01.01	07.F.55.01.01.01	07.F.55.01.01.01.01	07.F.55.01.01.01.01	07.F.55.01.01.01.01	07.F.55.01.01.01.01	
07.F.56	07.F.56.01	07.F.56.01.01	07.F.56.01.01.01	07.F.56.01.01.01.01	07.F.56.01.01.01.01	07.F.56.01.01.01.01	07.F.56.01.01.01.01	
07.F.57	07.F.57.01	07.F.57.01.01	07.F.57.01.01.01	07.F.57.01.01.01.01	07.F.57.01.01.01.01	07.F.57.01.01.01.01	07.F.57.01.01.01.01	
07.F.58	07.F.58.01	07.F.58.01.01	07.F.58.01.01.01	07.F.58.01.01.01.01	07.F.58.01.01.01.01	07.F.58.01.01.01.01	07.F.58.01.01.01.01	
07.F.59	07.F.59.01	07.F.59.01.01	07.F.59.01.01.01	07.F.59.01.01.01.01	07.F.59.01.01.01.01	07.F.59.01.01.01.01	07.F.59.01.01.01.01	
07.F.60	07.F.60.01	07.F.60.01.01	07.F.60.01.01.01	07.F.60.01.01.01.01	07.F.60.01.01.01.01	07.F.60.01.01.01.01	07.F.60.01.01.01.01	
07.F.61	07.F.61.01	07.F.61.01.01	07.F.61.01.01.01	07.F.61.01.01.01.01	07.F.61.01.01.01.01	07.F.61.01.01.01.01	07.F.61.01.01.01.01	
07.F.62	07.F.62.01	07.F.62.01.01	07.F.62.01.01.01	07.F.62.01.01.01.01	07.F.62.01.01.01.01	07.F.62.01.01.01.01	07.F.62.01.01.01.01	
07.F.63	07.F.63.01	07.F.63.01.01	07.F.63.01.01.01	07.F.63.01.01.01.01	07.F.63.01.01.01.01	07.F.63.01.01.01.01	07.F.63.01.01.01.01	
07.F.64	07.F.64.01	07.F.64.01.01	07.F.64.01.01.01	07.F.64.01.01.01.01	07.F.64.01.01.01.01	07.F.64.01.01.01.01	07.F.64.01.01.01.01	
07.F.65	07.F.65.01	07.F.65.01.01	07.F.65.01.01.01	07.F.65.01.01.01.01	07.F.65.01.01.01.01	07.F.65.01.01.01.01	07.F.65.01.01.01.01	
07.F.66	07.F.66.01	07.F.66.01.01	07.F.66.01.01.01	07.F.66.01.01.01.01	07.F.66.01.01.01.01	07.F.66.01.01.01.01	07.F.66.01.01.01.01	
07.F.67	07.F.67.01	07.F.67.01.01	07.F.67.01.01.01	07.F.67.01.01.01.01	07.F.67.01.01.01.01	07.F.67.01.01.01.01	07.F.67.01.01.01.01	
07.F.68	07.F.68.01	07.F.68.01.01	07.F.68.01.01.01	07.F.68.01.01.01.01	07.F.68.01.01.01.01	07.F.68.01.01.01.01	07.F.68.01.01.01.01	
07.F.69	07.F.69.01	07.F.69.01.01	07.F.69.01.01.01	07.F.69.01.01.01.01	07.F.69.01.01.01.01	07.F.69.01.01.01.01	07.F.69.01.01.01.01	
07.F.70	07.F.70.01	07.F.70.01.01	07.F.70.01.01.01	07.F.70.01.01.01.01	07.F.70.01.01.01.01	07.F.70.01.01.01.01	07.F.70.01.01.01.01	
07.F.71	07.F.71.01	07.F.71.01.01	07.F.71.01.01.01	07.F.71.01.01.01.01	07.F.71.01.01.01.01	07.F.71.01.01.01.01	07.F.71.01.01.01.01	
07.F.72	07.F.72.01	07.F.72.01.01	07.F.72.01.01.01	07.F.72.01.01.01.01	07.F.72.01.01.01.01	07.F.72.01.01.01.01	07.F.72.01.01.01.01	
07.F.73	07.F.73.01	07.F.73.01.01	07.F.73.01.01.01	07.F.73.01.01.01.01	07.F.73.01.01.01.01	07.F.73.01.01.01.01	07.F.73.01.01.01.01	
07.F.74	07.F.74.01	07.F.74.01.01	07.F.74.01.01.01	07.F.74.01.01.01.01	07.F.74.01.01.01.01	07.F.74.01.01.01.01	07.F.74.01.01.01.01	
07.F.75	07.F.75.01	07.F.75.01.01	07.F.75.01.01.01	07.F.75.01.01.01.01	07.F.75.01.01.01.01	07.F.75.01.01.01.01	07.F.75.01.01.01.01	
07.F.76	07.F.76.01	07.F.76.01.01	07.F.76.01.01.01	07.F.76.01.01.01.01	07.F.76.01.01.01.01	07.F.76.01.01.01.01	07.F.76.01.01.01.01	
07.F.77	07.F.77.01	07.F.77.01.01	07.F.77.01.01.01	07.F.77.01.01.01.01	07.F.77.01.01.01.01	07.F.77.01.01.01.01	07.F.77.01.01.01.01	
07.F.78	07.F.78.01	07.F.78.01.01	07.F.78.01.01.01	07.F.78.01.01.01.01	07.F.78.01.01.01.01	07.F.78.01.01.01.01	07.F.78.01.01.01.01	
07.F.79	07.F.79.01	07.F.79.01.01	07.F.79.01.01.01	07.F.79.01.01.01.01	07.F.79.01.01.01.01	07.F.79.01.01.01.01	07.F.79.01.01.01.01	
07.F.80	07.F.8							

AFP Records Retention Manual as of 12/3/2010

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AFIP Records Retention Manual as of 12/20/04

Regulatory Code	Record Series	Record Title	Record #	Classification	Retention Period	Notes
12 A 06	12 ENVIRONMENTAL	A. Clean Air Act	01	Administrative (AC) - Records which are subject to a retention schedule, when retention of records is required.	2 years	No
12 A 07	12 ENVIRONMENTAL	A. Clean Air Act	07	Operating Permit Program - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 A 08	12 ENVIRONMENTAL	A. Clean Air Act	08	Records of all reports and data for the permit.	3 years	No
12 A 09	12 ENVIRONMENTAL	A. Clean Air Act	09	Records of all reports and data for the permit.	3 years	No
12 A 10	12 ENVIRONMENTAL	A. Clean Air Act	10	Records of all reports and data for the permit.	3 years	No
12 A 11	12 ENVIRONMENTAL	A. Clean Air Act	11	Records of all reports and data for the permit.	3 years	No
12 B 01	12 ENVIRONMENTAL	B. Safe Drinking Water Act (SDWA) - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	01	Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 B 02	12 ENVIRONMENTAL	B. Safe Drinking Water Act (SDWA) - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	02	Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 B 03	12 ENVIRONMENTAL	B. Safe Drinking Water Act (SDWA) - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	03	Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 B 04	12 ENVIRONMENTAL	B. Safe Drinking Water Act (SDWA) - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	04	Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 B 05	12 ENVIRONMENTAL	B. Safe Drinking Water Act (SDWA) - Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	05	Records of required monitoring data and supporting information including monitoring data and reports and records of all reports and data for the permit.	5 years	No
12 C 01	12 ENVIRONMENTAL	C. Clean Water Act	01	Records of all reports and data for the permit.	5 years	No
12 C 02	12 ENVIRONMENTAL	C. Clean Water Act	02	Records of all reports and data for the permit.	5 years	No
12 C 03	12 ENVIRONMENTAL	C. Clean Water Act	03	Records of all reports and data for the permit.	5 years	No
12 C 04	12 ENVIRONMENTAL	C. Clean Water Act	04	Records of all reports and data for the permit.	5 years	No
12 C 05	12 ENVIRONMENTAL	C. Clean Water Act	05	Records of all reports and data for the permit.	5 years	No
12 C 06	12 ENVIRONMENTAL	C. Clean Water Act	06	Records of all reports and data for the permit.	5 years	No
12 C 07	12 ENVIRONMENTAL	C. Clean Water Act	07	Records of all reports and data for the permit.	5 years	No
12 C 08	12 ENVIRONMENTAL	C. Clean Water Act	08	Records of all reports and data for the permit.	5 years	No
12 C 09	12 ENVIRONMENTAL	C. Clean Water Act	09	Records of all reports and data for the permit.	5 years	No
12 C 10	12 ENVIRONMENTAL	C. Clean Water Act	10	Records of all reports and data for the permit.	5 years	No
12 D 01	12 ENVIRONMENTAL	D. Toxic Substances Control Act (TSCA)	01	Records of all reports and data for the permit.	5 years	No
12 D 02	12 ENVIRONMENTAL	D. Toxic Substances Control Act (TSCA)	02	Records of all reports and data for the permit.	5 years	No
12 D 03	12 ENVIRONMENTAL	D. Toxic Substances Control Act (TSCA)	03	Records of all reports and data for the permit.	5 years	No
12 D 04	12 ENVIRONMENTAL	D. Toxic Substances Control Act (TSCA)	04	Records of all reports and data for the permit.	5 years	No
12 D 05	12 ENVIRONMENTAL	D. Toxic Substances Control Act (TSCA)	05	Records of all reports and data for the permit.	5 years	No

AEP Records Retention (Manual) as of 12/31/2010								
Asset Number	Record Dates	Record #	Record Title	Record #	Record Title	Retention Period	Unit Record	Comments
12 E 001	12 E 001-12 E 001	01	E. Researcher's Contribution and Recovery Ad (RCN)	01	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 002	12 E 002-12 E 002	02	E. Researcher's Contribution and Recovery Ad (RCN)	02	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 003	12 E 003-12 E 003	03	E. Researcher's Contribution and Recovery Ad (RCN)	03	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years to the study	No	
12 E 004	12 E 004-12 E 004	04	E. Researcher's Contribution and Recovery Ad (RCN)	04	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 005	12 E 005-12 E 005	05	E. Researcher's Contribution and Recovery Ad (RCN)	05	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 006	12 E 006-12 E 006	06	E. Researcher's Contribution and Recovery Ad (RCN)	06	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 007	12 E 007-12 E 007	07	E. Researcher's Contribution and Recovery Ad (RCN)	07	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 008	12 E 008-12 E 008	08	E. Researcher's Contribution and Recovery Ad (RCN)	08	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 009	12 E 009-12 E 009	09	E. Researcher's Contribution and Recovery Ad (RCN)	09	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 010	12 E 010-12 E 010	10	E. Researcher's Contribution and Recovery Ad (RCN)	10	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 011	12 E 011-12 E 011	11	E. Researcher's Contribution and Recovery Ad (RCN)	11	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 012	12 E 012-12 E 012	12	E. Researcher's Contribution and Recovery Ad (RCN)	12	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 013	12 E 013-12 E 013	13	E. Researcher's Contribution and Recovery Ad (RCN)	13	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 014	12 E 014-12 E 014	14	E. Researcher's Contribution and Recovery Ad (RCN)	14	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 015	12 E 015-12 E 015	15	E. Researcher's Contribution and Recovery Ad (RCN)	15	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 016	12 E 016-12 E 016	16	E. Researcher's Contribution and Recovery Ad (RCN)	16	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 017	12 E 017-12 E 017	17	E. Researcher's Contribution and Recovery Ad (RCN)	17	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 018	12 E 018-12 E 018	18	E. Researcher's Contribution and Recovery Ad (RCN)	18	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 019	12 E 019-12 E 019	19	E. Researcher's Contribution and Recovery Ad (RCN)	19	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 020	12 E 020-12 E 020	20	E. Researcher's Contribution and Recovery Ad (RCN)	20	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 021	12 E 021-12 E 021	21	E. Researcher's Contribution and Recovery Ad (RCN)	21	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 022	12 E 022-12 E 022	22	E. Researcher's Contribution and Recovery Ad (RCN)	22	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 023	12 E 023-12 E 023	23	E. Researcher's Contribution and Recovery Ad (RCN)	23	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 024	12 E 024-12 E 024	24	E. Researcher's Contribution and Recovery Ad (RCN)	24	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 025	12 E 025-12 E 025	25	E. Researcher's Contribution and Recovery Ad (RCN)	25	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 026	12 E 026-12 E 026	26	E. Researcher's Contribution and Recovery Ad (RCN)	26	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 027	12 E 027-12 E 027	27	E. Researcher's Contribution and Recovery Ad (RCN)	27	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 028	12 E 028-12 E 028	28	E. Researcher's Contribution and Recovery Ad (RCN)	28	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 029	12 E 029-12 E 029	29	E. Researcher's Contribution and Recovery Ad (RCN)	29	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 030	12 E 030-12 E 030	30	E. Researcher's Contribution and Recovery Ad (RCN)	30	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 031	12 E 031-12 E 031	31	E. Researcher's Contribution and Recovery Ad (RCN)	31	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 032	12 E 032-12 E 032	32	E. Researcher's Contribution and Recovery Ad (RCN)	32	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 033	12 E 033-12 E 033	33	E. Researcher's Contribution and Recovery Ad (RCN)	33	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 034	12 E 034-12 E 034	34	E. Researcher's Contribution and Recovery Ad (RCN)	34	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 035	12 E 035-12 E 035	35	E. Researcher's Contribution and Recovery Ad (RCN)	35	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 036	12 E 036-12 E 036	36	E. Researcher's Contribution and Recovery Ad (RCN)	36	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 037	12 E 037-12 E 037	37	E. Researcher's Contribution and Recovery Ad (RCN)	37	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 038	12 E 038-12 E 038	38	E. Researcher's Contribution and Recovery Ad (RCN)	38	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 039	12 E 039-12 E 039	39	E. Researcher's Contribution and Recovery Ad (RCN)	39	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 040	12 E 040-12 E 040	40	E. Researcher's Contribution and Recovery Ad (RCN)	40	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 041	12 E 041-12 E 041	41	E. Researcher's Contribution and Recovery Ad (RCN)	41	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 042	12 E 042-12 E 042	42	E. Researcher's Contribution and Recovery Ad (RCN)	42	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 043	12 E 043-12 E 043	43	E. Researcher's Contribution and Recovery Ad (RCN)	43	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 044	12 E 044-12 E 044	44	E. Researcher's Contribution and Recovery Ad (RCN)	44	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 045	12 E 045-12 E 045	45	E. Researcher's Contribution and Recovery Ad (RCN)	45	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 046	12 E 046-12 E 046	46	E. Researcher's Contribution and Recovery Ad (RCN)	46	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 047	12 E 047-12 E 047	47	E. Researcher's Contribution and Recovery Ad (RCN)	47	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 048	12 E 048-12 E 048	48	E. Researcher's Contribution and Recovery Ad (RCN)	48	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 049	12 E 049-12 E 049	49	E. Researcher's Contribution and Recovery Ad (RCN)	49	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 050	12 E 050-12 E 050	50	E. Researcher's Contribution and Recovery Ad (RCN)	50	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 051	12 E 051-12 E 051	51	E. Researcher's Contribution and Recovery Ad (RCN)	51	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 052	12 E 052-12 E 052	52	E. Researcher's Contribution and Recovery Ad (RCN)	52	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 053	12 E 053-12 E 053	53	E. Researcher's Contribution and Recovery Ad (RCN)	53	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 054	12 E 054-12 E 054	54	E. Researcher's Contribution and Recovery Ad (RCN)	54	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 055	12 E 055-12 E 055	55	E. Researcher's Contribution and Recovery Ad (RCN)	55	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 056	12 E 056-12 E 056	56	E. Researcher's Contribution and Recovery Ad (RCN)	56	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 057	12 E 057-12 E 057	57	E. Researcher's Contribution and Recovery Ad (RCN)	57	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 058	12 E 058-12 E 058	58	E. Researcher's Contribution and Recovery Ad (RCN)	58	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 059	12 E 059-12 E 059	59	E. Researcher's Contribution and Recovery Ad (RCN)	59	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 060	12 E 060-12 E 060	60	E. Researcher's Contribution and Recovery Ad (RCN)	60	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 061	12 E 061-12 E 061	61	E. Researcher's Contribution and Recovery Ad (RCN)	61	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 062	12 E 062-12 E 062	62	E. Researcher's Contribution and Recovery Ad (RCN)	62	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 063	12 E 063-12 E 063	63	E. Researcher's Contribution and Recovery Ad (RCN)	63	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 064	12 E 064-12 E 064	64	E. Researcher's Contribution and Recovery Ad (RCN)	64	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 065	12 E 065-12 E 065	65	E. Researcher's Contribution and Recovery Ad (RCN)	65	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 066	12 E 066-12 E 066	66	E. Researcher's Contribution and Recovery Ad (RCN)	66	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 067	12 E 067-12 E 067	67	E. Researcher's Contribution and Recovery Ad (RCN)	67	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 068	12 E 068-12 E 068	68	E. Researcher's Contribution and Recovery Ad (RCN)	68	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 069	12 E 069-12 E 069	69	E. Researcher's Contribution and Recovery Ad (RCN)	69	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 070	12 E 070-12 E 070	70	E. Researcher's Contribution and Recovery Ad (RCN)	70	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 071	12 E 071-12 E 071	71	E. Researcher's Contribution and Recovery Ad (RCN)	71	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 072	12 E 072-12 E 072	72	E. Researcher's Contribution and Recovery Ad (RCN)	72	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 073	12 E 073-12 E 073	73	E. Researcher's Contribution and Recovery Ad (RCN)	73	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 074	12 E 074-12 E 074	74	E. Researcher's Contribution and Recovery Ad (RCN)	74	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 075	12 E 075-12 E 075	75	E. Researcher's Contribution and Recovery Ad (RCN)	75	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 076	12 E 076-12 E 076	76	E. Researcher's Contribution and Recovery Ad (RCN)	76	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 077	12 E 077-12 E 077	77	E. Researcher's Contribution and Recovery Ad (RCN)	77	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 078	12 E 078-12 E 078	78	E. Researcher's Contribution and Recovery Ad (RCN)	78	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 079	12 E 079-12 E 079	79	E. Researcher's Contribution and Recovery Ad (RCN)	79	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 080	12 E 080-12 E 080	80	E. Researcher's Contribution and Recovery Ad (RCN)	80	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 081	12 E 081-12 E 081	81	E. Researcher's Contribution and Recovery Ad (RCN)	81	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 082	12 E 082-12 E 082	82	E. Researcher's Contribution and Recovery Ad (RCN)	82	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 083	12 E 083-12 E 083	83	E. Researcher's Contribution and Recovery Ad (RCN)	83	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 084	12 E 084-12 E 084	84	E. Researcher's Contribution and Recovery Ad (RCN)	84	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 085	12 E 085-12 E 085	85	E. Researcher's Contribution and Recovery Ad (RCN)	85	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 086	12 E 086-12 E 086	86	E. Researcher's Contribution and Recovery Ad (RCN)	86	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 087	12 E 087-12 E 087	87	E. Researcher's Contribution and Recovery Ad (RCN)	87	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 088	12 E 088-12 E 088	88	E. Researcher's Contribution and Recovery Ad (RCN)	88	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 089	12 E 089-12 E 089	89	E. Researcher's Contribution and Recovery Ad (RCN)	89	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 090	12 E 090-12 E 090	90	E. Researcher's Contribution and Recovery Ad (RCN)	90	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	
12 E 091	12 E 091-12 E 091	91	E. Researcher's Contribution and Recovery Ad (RCN)	91	Records regarding performance of research activities. Copies of test results, results of research and other test data (includes research results and test results) Researcher's Contribution and Recovery Ad (RCN)	3 years	No	

ALP Records Retention Manual as of 12/3/2010

[illegible]

AEP Records Retention Manual as of 2/3/2018[illegible]

AEP Records Retention Manual as of 11/20/2019									
APR 08	APR 09	APR 10	APR 11	APR 12	APR 13	APR 14	APR 15	APR 16	APR 17
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