

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Columbus Southern Power Company	)	Case No. 11-178-EL-UNC
for Approval of a Change in Bill Format	)	

In the Matter of the Application of	)	
Columbus Southern Power Company to	)	
Establish New Experimental Rate	)	Case No. 10-424-EL-ATA
Schedule Classifications for Residential	)	
and Small General Service Time of Day	)	
Rates and Residential Experimental	)	
Direct Load Control Rider	)	

**REPLY COMMENTS OF COLUMBUS SOUTHERN POWER COMPANY**

Columbus Southern Power Company's (CSP or the Company) application for approval of a change in bill format relates to a limited, experimental direct load control (DLC) service program recently approved by the Commission on December 1, 2010. The Company is simply updating its bill format to match the revised tariffs filed in January. (Case No. 10-424-EL-ATA, 11-178-EL-UNC, January 13, 2011)

On February 7, 2011, the Office of Consumers' Counsel (OCC) moved to intervene in this proceeding, and on February 15, filed Comments opposing CSP's application for approval of the bill format change. The OCC Comments advocate a wholesale re-write of CSP's bill, including a detailed explanation of the DLC program. (OCC Comments at 3). And the Comments are not limited to the DLC program. Rather, OCC criticizes plain language such as "Due date does not apply to Previous Balance Due" that has been approved by the Commission, and used on past CSP bills. (*See, e.g.*, Case No. 09-0279-EL-UNC, CSP bill format approved containing identical language). The OCC also recommends including more information about

budget billing and explanations related to the Percentage of Income Payment Plan Program (PIPP)

With regard to the specifics of the voluntary, experimental DLC program, the program is explained in great detail in the tariff filed by CSP on January 13, 2011. For example, OCC's concerns about the "opt out" language in the DLC line item are clearly addressed by the tariff, which states that if a customer opts out of a demand management event, the bill credit is reduced. See Rider DLC, Sheet 16-2. The language does not refer to opting in – or out – of the DLC program. Participants will learn, at the time of enrollment and through information on the Company's website, how the program will work to reduce their energy usage and utility bills. Again, the customer's bill is not the appropriate place for such an explanation.

Last, the Percentage of Income Payment Plan language is in the "Messages" section of the bill format. It is just one of AEP Ohio's recurring, standard messages inviting inquiries into the program for those interested, completely unrelated to the DLC program. The DLC bill is not the appropriate place to explain PIPP or describe PIPP eligibility, and therefore, the language does *not* state how or whether a DLC participant can participate in PIPP. In short, the information that OCC advocates adding to CSP's simple DLC bill format would unnecessarily increase the length and complexity of the bill many times over.

In response to OCC's concern about the abbreviation of "DLC," CSP is willing to modify the line item to make the bill more clear. Attached hereto at Attachment 1-A is a revised bill format that does not have the abbreviation "DLC" – as contained in the bill format attached to CSP's original application – but rather spells out "Direct Load Control Credit" as a line item. CSP discussed this revision with Commission staff, and provided them with a copy of the

requested revised format change to ensure their input was received before filing with the Commission

CSP submits that the revised bill format attached hereto complies with all applicable Commission rules and regulations, and provides all pertinent information to DLC participants in a concise, clear and understandable manner. Accordingly, CSP respectfully requests that the revised bill format be approved in an expedited fashion, in furtherance of the revised tariffs that became effective January 14, 2011.

Respectfully submitted,

//s/Anne M. Vogel  
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Anne M. Vogel  
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Counsel for Columbus Southern Power Company

Filed: March 1, 2011

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Reply Comments of Columbus Southern Power Company has been served upon the below-named counsel via First Class mail, postage prepaid, this 1<sup>st</sup> day of March, 2011.

//s/Anne M. Vogel  
Anne M. Vogel

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Bill Date: 11/30/2010

Total Amount Due . . . . . \$ 106.89

Due Date Dec 16

Send Inquiries To:

PO BOX 24401

CANTON, OH 44701-4401

R-C-640367407

Amount Enclosed \$

The Neighbor to Neighbor program helps  
disadvantaged customers pay their electric  
bill. I want to help. My payment reflects  
my gift of \$

Make Check Payable and Send To:

AMERICAN ELECTRIC POWER

PO BOX 24417

CANTON OH 44701-4417

CUSTOMER NAME

CUSTOMER ADDRESS

CITY, ST. ZIP

0000114890000114890100000000001019149500030111612002900003

Account Number XXX-XXX-XXX-X-X CYC 2 55

Please tear on dotted line and return top portion with your payment

SERVICE AT:

For Billing, Outage or

Service Inquiries, Call:

1-800-277-2177

Account Number

XXX-XXX-XXX-X-X

Bill Date 11/30/10

CUSTOMER NAME

CUSTOMER ADDRESS

CUSTOMER LOCATION

CITY, ST. ZIP

PREVIOUS CHARGES:

Total Amount Due at Last Billing

Account Balance

Amount Due

Payment 11/15/10 - Thank You

Previous Balance

\$ 114.63

114.63 CR

\$ .00

\$ .00

CURRENT AEP CHARGES (1-800-277-2177):

11/30/Tariff 013 - RESIDENTIAL SERVICE

Service Delivery Identifier Number: XXXX-XXXX-XXXX-XXXX-X

Generation Service

Transmission Service

Distribution Service

Customer Charge

Direct Load Control Credit 0 Opt Out

\$ 58.04

7.43

44.90

4.52

8.00 CR

Current AEP Charges Due \$ 106.89

\$ 106.89

Total Amount Due . . . . . \$ 106.89

Due Date Dec 16

\$3.48 is your average daily cost for current electric service XXX-XXX-XXX-X

Price To Compare

For tariff 013, in order to save you money a new supplier must offer you a price  
lower than 6.6 cents per KWH for the same usage that appears on this bill. You  
may contact AEP at the phone number shown on this bill to receive additional  
information, including a written explanation, about this Price-To-Compare.

Due date does not apply to Previous Balance Due.

See other side for important information.

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SERVICE AI:

CUSTOMER NAME

CUSTOMER ADDRESS

CUSTOMER LOCATION

Account Number  
101-914-950-0-0

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USAGE:

Service Period		Meter Reading				
Meter Number	From	To	Prev	CD Pres	CD Multiplier	Metered Usage
XXXXXXXXXX	10/28/10	11/30/10	013010	Y	014000 Y	1.0000 990 KWH
CD - Read CodeY =Ami Reading			33	BillingNext	Scheduled Read Date	01/03/11
Month Usage	Month Usage	Month Usage	Month Usage	Month Usage	Month Usage	Month Usage
Dec 09	1,123	Feb 10	1,163	Apr 10	962	Jun 10 1,505
Jan 10	1,305	Mar 10	931	May 10	1,097	Jul 10 1,685
Average Monthly Usage: 1327 KWH			Total Usage (Past 12 Months): 15930 KWH			

AEP MESSAGES:

Ohio customers needing assistance may be eligible to participate in the Percentage of Income Payment Plan. Under the program, called PIPP Plus, customers receive incentives for making monthly payments based on household income on time and in full. If you have any questions about the program or your eligibility, please contact the Ohio Department of Development at 1-800-282-0880.

Turn in your old, working refrigerator or freezer with AEP Ohio's Appliance Recycling Program and get FREE, convenient pickup and recycling of the appliance, a \$50 rebate check and long term savings on your electric bill. Visit [gridSMARTOhio.com](http://gridSMARTOhio.com) or call 1-877-545-4112 to sign up. Hurry, the \$50 rebate offer expires 12/31/10.

Visit us at [www.AEPOhio.com](http://www.AEPOhio.com)

Due date does not apply to Previous Balance Due.  
See other side for important information.

**This foregoing document was electronically filed with the Public Utilities**

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**in**

**Case No(s). 11-0178-EL-UNC, 10-0424-EL-ATA**

Summary: Comments Reply Comments of CSP electronically filed by Anne M Vogel on behalf of American Electric Power Company, Inc.