

FILE

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbus Southern Power Company)
and Ohio Power Company to Establish) Case No. 11-1337-EL-RDR
Environmental Investment Carrying)
Cost Rider.)

**COMMENTS AND RECOMMENDATION
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**COMMENTS AND RECOMMENDATION
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THE PUBLIC UTILITIES COMMISSION OF OHIO**

Background

On March 18, 2010, Columbus Southern Power Company (CSP) and Ohio Power Company (OP), collectively the Applicants or Companies, filed an application to update their Environmental Investment Carrying Cost Riders (EICCRs) in accordance with the Commission's Opinion and Order and Entry on Rehearing in their ESP cases, Nos. 08-917-EL-SSO for CSP, and 08-918-EL-SSO for OP (hereinafter referred to as "ESP Cases"). The EICCR rider rate for each company was established by Commission issued Finding and Order in Case No. 10-155-EL-RDR on August 25, 2010. The current application proposes to adjust each EICRR rate by capital expenditures incurred during calendar year 2010. The proposed initial EICRR rate is 8.78602% of Non-FAC Generation Charges for CSP and 6.55762% for OP.

Staff's Review

The Staff completed inspections of capital expenditures made during 2010 at the Conesville and Amos Power Plants. The Staff reviewed invoices and source documents supporting the capital costs included in the Applicant's continuing property records (CPR). The Staff found no errors or discrepancies.


The Staff reviewed the revenue requirement calculation and the revenue utilized. The Staff found no errors in the calculations and verified the revenue factor is the same as approved in the Applicant's prior filing.

The Staff recommends the Applicant's proposed total revenue requirement of \$10,120,000 for CSP and \$6,140,000 for OP be approved.

Respectfully submitted,

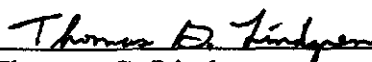
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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Comments and Recommendation** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage pre-paid, or hand delivered, upon the following Parties of Record this 20th day of May, 2011.



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Assistant Attorney General

Parties of Record:

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