

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company for Authority to)
Establish a Standard Service Offer)
Pursuant to §4928.143, Ohio Rev. Code,)
in the Form of an Electric Security Plan.)

Case No. 11-346-EL-SSO
Case No. 11-348-EL-SSO

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company for Approval of)
Certain Accounting Authority.)

Case No. 11-349-EL-AAM
Case No. 11-350-EL-AAM

**MOTION OF COLUMBUS SOUTHERN POWER COMPANY AND OHIO
POWER COMPANY FOR LEAVE TO FILE ADDITIONAL TESTIMONY AND
ADJUST THE PROCEDURAL SCHEDULE AND REQUEST FOR EXPEDITED
RULING**

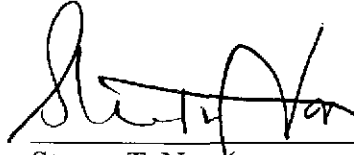
Columbus Southern Power Company ("CSP") and Ohio Power Company ("OPCo") (collectively, "AEP Ohio") request leave to file the supplemental testimony and exhibits of Company witnesses Jay F. Godfrey, Philip J. Nelson, Thomas E. Mitchell, Michael J. Kelley and David M. Roush relating to the Turning Point Solar Project. AEP Ohio further seeks limited adjustments to the procedural schedule, as necessary, to accommodate the supplemental testimony. In accordance with Rule 4901-1-12(C), Ohio Admin. Code, AEP Ohio requests an expedited ruling in response to these requests.

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These motions are supported by the attached memorandum in support.

Respectfully Submitted,

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MEMORANDUM IN SUPPORT

In AEP Ohio's application for a standard service offer filed January 27, 2011, the companies requested a waiver of certain administrative rules and proposed to make a separate filing supporting a non-bypassable Generation Resource Rider ("GRR") to collect the costs associated with the companies' investment in generating facilities under Section 4928.143(B)(2)(c), Revised Code. Specifically, AEP Ohio stated that upon completion of the negotiations for the Turning Point Solar Project, it would provide the necessary information establishing the rate level for the proposed GRR rider. By Entry dated March 23, 2011, the Attorney Examiner granted AEP Ohio's request for a waiver of Ohio Administrative Code Rules 4901:1-35-03(C)(3) and 4901:1-35-03(C)(9)(b), and requested that AEP Ohio provide updated information related to the Turning Point solar project as necessary to processing the application.

While the Companies initial testimony filed with the Application addressed several significant aspects of the proposed Turning Point Solar Project, the details of the commercial arrangement were not finalized. The Participation Agreement for the Turning Point Solar Project was just finalized this week and AEP Ohio now seeks leave to file supplemental testimony which will describe and explain the project in detail, including the substantial benefits to the State of Ohio (more than 600 new jobs) as well as the projected cost to be paid by AEP Ohio's customers. Specifically, AEP Ohio now requests leave to file supplemental/additional testimony and exhibits of Company witnesses Jay F. Godfrey, Philip J. Nelson, Thomas E. Mitchell, Michael J. Kelley and David M. Roush relating to the Turning Point Solar Project.

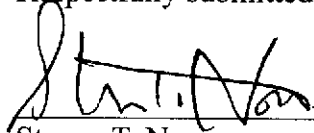
The only significant issue relating to the Turning Point Solar Project and AEP Ohio's proposed non-bypassable charge for the life of the facility that is not addressed in the above-described testimonies is AEP Ohio's "need" for the involved 49.9 MW of generating capacity from a resource planning perspective. AEP Ohio understands that this is an important issue that needs to be resolved in conjunction with the Commission's approval of the proposed non-bypassable charge for the life of the Turning Point facility. To this end, AEP Ohio filed its Supplemental 2010 Long-Term Forecast Report filed on December 20, 2010 in Case Nos. 10-501-EL-FOR and 10-502-EL-FOR reflecting the need for the Turning Point Solar Project. Further, AEP Ohio is prepared to file supporting testimony in those cases as soon as possible and would like to establish a procedural schedule to move forward. To the extent the Commission would prefer to address the need issues in this docket, however, AEP Ohio is also prepared to do so and would alternatively request a ruling to that effect if that is the Commission's preference.

Procedural Schedule Adjustments

In the recent procedural entry, the attorney examiner set the following modifications to the procedural schedule: AEP Ohio's supplemental testimony on the "provider of last resort" charge is due July 6. Testimony filed by Intervenors is due July 15, and the discovery deadline is July 22. (Case No. 11-346, Entry dated June 9, 2011.) Because the Turning Point supplemental testimony is being filed on July 1 (subject to this pending request for leave), well in advance of the current testimony and discovery deadlines, AEP Ohio does not believe that any adjustments to the current schedule are necessary. However, to the extent the Commission determines to allow extra time for Intervenor testimony or discovery, AEP Ohio requests that such extensions be limited to

the issues raised in the supplemental testimony, specific to the Turning Point Solar Project.

Respectfully submitted,

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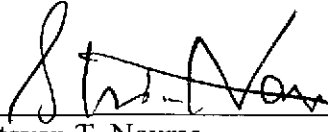
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Columbus Southern Power Company's and Ohio Power Company's Motions and Request of Expedited Ruling has been served upon the below-named counsel via First Class mail, postage prepaid, this 1st day of July 2011.


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