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September 9, 2011

Ms. Betty McCauley, Secretary
Public Utilities Commission of Ohio
180 E. Broad Street, 11th Floor
Columbus, OH 43215

Re: Joint Motion to Consolidate
Case No. 10-2376-EL-UNC
Case No. 11-346-EL-SSO
Case No. 11-348-EL-SSO
Case No. 11-349-EL-AAM
Case No. 11-350-EL-AAM
Case No. 10-343-EL-ATA
Case No. 10-344-EL-ATA
Case No. 10-2929-EL-UNC
Case No. 11-4920-EL-RDR
Case No. 11-4921-EL-RDR

Dear Ms. McCauley:

This letter is being filed on behalf of the Ohio Cable Telecommunications Association ("OCTA") with regard to the Joint Motion to Consolidate the above captioned cases filed by the Joint Movants referenced therein on September 8, 2001. On September 7, 2011, a Stipulation and Recommendation was filed in the Case Nos. noted above ("Stipulation"). Provisions in the Stipulation address issues in the Columbus Southern Power Company ("CSP") and Ohio Power Company's ("OPCo" and jointly, "AEP Ohio") Application for Merger (the "Merger Case"). OCTA filed a motion to intervene in the Merger Case and thus has an interest in the Stipulation and subsequent Motion to Consolidate.

A significant concern of OCTA in the Merger Case relates to whether resolution of this proceeding might foreclose the issue of blended rates from being addressed in AEP Ohio Case Nos. 11-351-EL-AIR, *et seq.*, the distribution rate cases in which the OCTA has also intervened. Particularly, there is a concern whether such blended rates would be proper without allowing OCTA members to experience any of the assumed efficiencies in pole attachment pricing that the AEP Ohio promises from the merger. Taking this concern into consideration, OCTA does not object to the Motion to Consolidate for the purpose of reviewing the Stipulation as a result of

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Case and its affect on pole attachment rates.

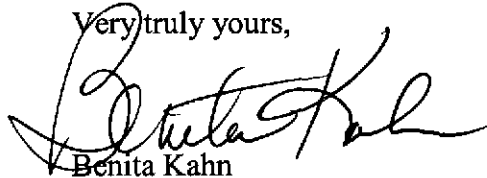
Section IV.3 of the Stipulation provides:

The Signatory Parties recommend that the Commission would approve the merger and closing would occur after Commission approval of the Stipulation by the end of 2011, while maintaining separate rate zones for distribution rates until subsequently addressed by the Commission in a separate proceeding. Effective January 2012, CSP [Columbus Southern Power Company] and OPCo [Ohio Power Company] transmission rates will be consolidated and CSP and OPCo generation rates (including the FAC rates) will also be consolidated. (emphasis added).

AEP Ohio's Schedule PA (Pole Attachment) contained in the current and proposed tariffs in Case Nos. 11-351-EL-AIR, *et seq.* specifically references the pole attachments rates and charges as "distribution rates and charges." *See e.g.* CSP, PUCO No. 7, Schedule PA, Original Sheet No. 43-1. In the Distribution Rate Increase Application in Case Nos. 11-351-EL-AIR, *et seq.*, AEP Ohio references "distribution rates" broadly to include pole attachment rates. *See* Distribution Rate Increase Application, pp.3-4. Thus, OCTA understands that the provision in the Stipulation for maintenance of separate rate zones for distribution rates until subsequently addressed in a separate proceeding includes pole attachment rates. On the basis of this understanding, OCTA does not object to the Joint Motion to Consolidate.

Thank you for your consideration.

Very truly yours,



Benita Kahn

Attorney for

Ohio Cable Telecommunications Association

BK/jaw

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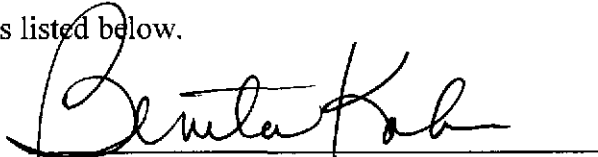
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 9th day of September, 2011 by electronic mail or where email addresses were not available, by regular mail, upon the persons listed below.


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