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October 5, 2011

Mr. Todd A. Snitchler, Chairman
The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

11-346-EL-SSO

PUCO

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Dear Chairman Snitchler:

During the summer Allen County determined it wanted to place opt-out governmental aggregation on the November ballot for the voters' consideration. Furthermore our community decided to participate in the County Commissioners Association of Ohio (CCAO) program. From our conversations with the CCAO, townships and cities in eight different counties representing 45,000 to 50,000 residential and small commercial consumers are on the November 1st ballot in AEP's distribution service territory. If the voters agree ratify opt-out governmental aggregation, our community would become part of the CCAO's current nine county program that already has 70,000 residential and small commercial consumers working together.

Yet despite the effort and the voters' expectations, provisions in AEP's Electricity Security Plan (ESP) proposed settlement effectively caps or limits shopping. Worse yet, the timing of the provisions are very likely to shut out our consumers from enjoying any savings. No settlement should eliminate the opportunity for governmental aggregation to capture savings for consumers after it has already been placed on the ballot.

The policy of this state to ensure effective competition in the provision of electric service - 4928.02 of the Ohio Revised Code - and it is the PUCO's mission to facilitate an environment that provides competitive choices. The reason our community's consumers have the potential for saving money on our electric generation supply is because a competitive generation supplier is competing for our business. It's apparent that the cap in AEP's proposed settlement is an attempt to prevent competitive suppliers from serving all the customers in their service area that want to save money.

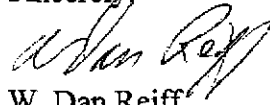
Right now, hundreds of thousands of consumers living in hundreds of other Ohio communities are saving money through their aggregation programs. Why are we

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being penalized for being AEP customers? And why should AEP be able to dictate which groups of residents and businesses are allowed to save money on their electric bills?

If the PUCO approves the caps, the people and businesses in communities like Harrod, Lafayette, Delphos, Beavertown, Cairo, Spencerville, and Ft. Shawnee will miss out on these savings. Other communities in Ohio have this opportunity to save and so should we.

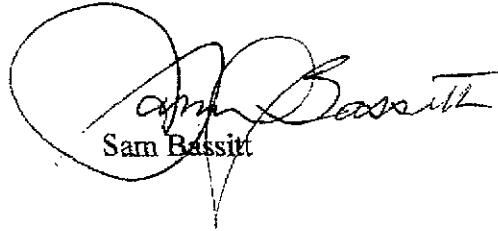
Sincerely,



W. Dan Reiff
Chairman



Greg Sneary
Vice Chairman



Sam Bassitt