

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern )  
Power Company and Ohio Power Company, Individually )  
and, if Their Proposed Merger is Approved, as a Merged ) Case No. 11-351-EL-AIR  
Company (collectively, AEP Ohio) for an Increase in ) Case No. 11-352-EL-AIR  
Electric Distribution Rates. )

In the Matter of the Application of Columbus Southern )  
Power Company and Ohio Power Company, Individually )  
and, if Their Proposed Merger is Approved, as a Merged ) Case No. 11-353-EL-ATA  
Company (collectively, AEP Ohio) for Tariff Approval. ) Case No. 11-354-EL-ATA

In the Matter of the Application of Columbus Southern )  
Power Company and Ohio Power Company, Individually )  
and, if Their Proposed Merger is Approved, as a Merged ) Case No. 11-356-EL-AAM  
Company (collectively, AEP Ohio) for Approval to Change ) Case No. 11-358-EL-AAM  
Accounting Methods. )

THE OHIO HOSPITAL ASSOCIATION'S  
OBJECTIONS TO THE  
STAFF REPORT OF INVESTIGATION

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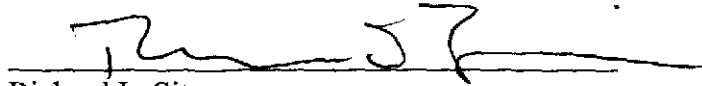
NOW COMES, the Ohio Hospital Association ("OHA"), by its attorneys, pursuant to Ohio Revised Code ("R.C.") Section 4909.19 and Ohio Administrative Code ("O.A.C.") Rule 4901-1-28, and makes the following objections to the Staff Report of Investigation ["Staff Report" or "SR"] prepared by the Staff ("Staff") of the Public Utilities Commission of Ohio ("Commission" or "PUCO")] and filed on September 15, 2011.

OHA objects to failure of the Staff Report to address the Companies' inclusion of rates and charges in its proposed Schedule AFS (Schedule E-2.1 Part 4C, Pages 141-145 of 219). This new tariff provision contains rates and charges that were not supported by sponsoring Witness Moore and contain monthly rates that are unjust and unreasonable relative to the appropriate cost of that service. With alternate feed service, a customer is provided temporary service from an alternate or secondary service line in the event that the customer's primary service line is unavailable. The

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alternate service does not entail the same system demands as the provision of a completely duplicative service facility due to the fact that such alternate feed service is intended to be limited in duration. The temporary nature of the demands place on the alternate facilities changes the facility requirement, and consequently the costs of providing that service. As drafted, Schedule AFS does not reflect this feature of the services and is unreasonable as a result. The Staff Report contains no identification or treatment of these issues, and the OHA objects to this omission.

Respectfully submitted on behalf of  
OHIO HOSPITAL ASSOCIATION




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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objections was served upon the parties of record listed below this 17<sup>th</sup> day of October 2011 *via* electronic mail.

  
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