

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

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

**JOINT MOTION FOR AN EXTENSION OF TIME TO FILE TESTIMONY
AND
CONTINUANCE OF THE EVIDENTIARY HEARING
AND
REQUEST FOR EXPEDITED RULING
BY
COLUMBUS SOUTHERN POWER COMPANY,
OHIO POWER COMPANY,
OFFICE OF THE OHIO CONSUMERS' COUNSEL AND
NATURAL RESOURCES DEFENSE COUNCIL**

Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13(A), the Columbus Southern Power Company (“CSP”) and Ohio Power Company (“OP”) jointly referred to as (“AEP-Ohio” or “Companies”), the Office of the Ohio Consumers’ Counsel (“OCC)

and the Natural Resources Defense Council (“NRDC”) collectively (“Joint Movants”) on behalf of the utility consumers of CSP and OP moves the Public Utilities Commission of Ohio (“PUCO” or “Commission”) for an extension of time for the filing of intervenor testimony. Specifically, the due date for testimony in support of the Stipulation and Recommendation (“Stipulation”) would be extended from November 28, 2011 at noon to November 29, 2011 at 5:30 PM. In addition, OCC requests a continuance of the hearing scheduled for November 29, 2011 to November 30, 2011 at 1:30PM. Joint Movants also seeks an expedited ruling under Ohio Adm. Code 4901-1-12(C). The reasons supporting these requests, along with an explanation of the need to determine the filing date on an expedited basis, are set forth in the attached Memorandum in Support. The Motion should be granted for good cause.

Respectfully submitted,

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Ohio) for Approval to Change Accounting)
Methods.)

**MEMORANDUM IN SUPPORT OF THE JOINT MOTION FOR AN EXTENSION
OF TIME TO FILE TESTIMONY IN SUPPORT OF THE STIPULATION
AND CONTINUANCE OF THE EVIDENTIARY HEARING
AND REQUEST FOR EXPEDITED RULING**

I. INTRODUCTION

These cases affect the rates paid by the approximately 1.2 million residential customers of AEP-Ohio's for electric distribution service. On January 27, 2011, the Companies filed a Notice of Intent that opened these cases. AEP-Ohio subsequently filed the Applications on February 28, 2011, that, among other matters, sought an increase in

distribution rates. OCC, the state's advocate for residential utility consumers, moved to intervene in these cases on February 9, 2011

On November 23, 2011, Parties filed a Stipulation and Recommendation that settled all issues in these Cases.

II. APPLICABLE PROCEDURAL RULES

Ohio Adm. Code 4901-1-13(A) specifically permits parties to move for extensions of time to file testimony. That rule provides for the granting of such motions for "good cause shown."

Ohio Adm. Code 4901-1-12(C) allows parties to request an expedited ruling on their motions. If the moving party certifies that it has contacted all the other parties and that all the parties do not object to the granting of the motion without the filing of memorandum contra, the Commission or the Attorney Examiner may issue an immediate ruling.

III. ARGUMENT

At a November 17, 2011 prehearing conference, the Attorney Examiners ruled that the Stipulation and testimony in support of the Stipulation must be filed no later than November 28, 2011 at noon, and the evidentiary hearing was scheduled for November 29, 2011. Pursuant to Ohio Adm. Code 4901-1-13(A), Joint Movants seek an extension of time to file testimony in support of the Stipulation from November 28, 2011 at noon until November 29, 2011 at 5:30 PM. In addition, Joint Movants request a continuance of the Evidentiary hearing from November 29, 2011 at 10:00 AM until November 30, 2011 at 1:30 PM. Joint Movants propose that the extension to file testimony in support apply to all Signatory Parties. The extension is requested because of the significant effort that was

expended to settle these cases and file the Stipulation, on November 23, 2011, immediately prior to the Thanksgiving Holiday weekend. Due to the Holiday weekend, several witnesses were out of the office and were traveling between November 22, 2011 and November 28, 2011; therefore, Joint Movants request the additional time to complete the testimony in support of the Stipulation.

The request for a continuance of the evidentiary hearing, will allow the Attorney Examiners time to review the testimony filed in support of the Stipulation prior to the time of hearing. At this time, Joint Movants are only aware of testimony in support to be filed by AEP-Ohio, OCC and NRDC.

The extension will not cause undue delay, and should not work to prejudice any party. The Stipulation has been signed by all parties in these cases except two, and it is Joint Movants' understanding that those two parties -- Industrial Energy Users-Ohio and FirstEnergy Solutions -- do not oppose the Stipulation. These circumstances therefore meet the requirement in Ohio Adm. Code 4901-1-13 for showing good cause. Finally, Joint Movants certify that all the parties to these cases have been contacted, pursuant to Ohio Adm. Code 4901-1-12(C), to inquire if they object to the issuance of a ruling on an expedited basis. No other parties object to the PUCO issuing an expedited ruling or granting the extension of time to file testimony without the opportunity for parties to file a memorandum in response to Motion. The non-objecting parties include (at the time of filing) , the Commission Staff, Ohio Energy Group, Ohio Hospital Association, FirstEnergy Solutions Corp, Ohio Manufacturers Association, the Kroger Company, Ormet Primary Aluminum Corporation, Ohio Cable Telecommunications Association, and the Ohio Department of Development; however, not all parties have responded. OCC requests a

ruling on this Motion in the shortest period of time possible for the purposes of permitting all parties to plan their schedules.

IV. CONCLUSION

For the reasons stated above, the Commission should grant Joint Movants' Motion based upon the showing of good cause. The Commission should grant this Motion in the shortest period of time possible.

Respectfully submitted,

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Council

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Joint Motion for Extension of Time to File Testimony and Request for Expedited Ruling by Columbus Southern Power Company, Ohio Power Company, the Office of the Ohio Consumers' Counsel and the Natural Resources Defense Counsel*, was served electronically to all parties this 28th day of November, 2011.

/s/ Larry S. Sauer

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Summary: Motion Joint Motion for an Extension of Time to File Testimony and Continuance of the Evidentiary Hearing and Request for Expedited Ruling by Columbus Southern Power Company, Ohio Power Company, Office of the Ohio Consumers' Counsel and Natural Resources Defense Council electronically filed by Ms. Deb J. Bingham on behalf of Larry S. Sauer