



## December 22, 2011

Honorable Greta See Honorable Jonathan J. Tauber Attorney Examiners Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215

Steven T. Nourse Senior Counsel – Regulatory Services (614) 716-1608 (P) (614) 716-2014 (F) stnourse@aep.com

Re: Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, 11-350-EL-AAM, 11-351-EL-AIR, 11-352-EL-AIR, 10-2376-EL-UNC, 10-343-EL-AIA, 10-344-EL-AIA, 10-2929-EL-UNC, 11-4920-EL-RDR, 11-4921-EL-RDR, 89-6003-EL-IRF, and 89-6007-EL-IRF

## Dear Attorney Examiners See and Tauber:

On December 14, 2011, the Commission issued an Opinion and Order that modified and adopted the September 7, 2011 Stipulation and Recommendation in Case Nos. 11-346-EL-SSO et al. (ESP Stipulation) That same day, the Commission issued another Opinion and Order that adopted the November 23, 2011 Stipulation and Recommendation in Case Nos. 11-351-EL-AIR et al. (AIR Stipulation) In accordance with the Commission's approval of the merger between Ohio Power Company and Columbus Power Company, a Certificate of Merger was executed effective at the end of 2011, such that Columbus Southern Power Company is merged into Ohio Power Company (the surviving entity is referred to herein as "AEP Ohio").

Because the rates and tariffs involved in the ESP Stipulation and AIR Stipulation together involve most of AEP Ohio's existing rates and tariffs and some tariffs are affected by both the ESP Stipulation and the AIR Stipulation, AEP Ohio is hereby submitting compliance tariffs that implement both the ESP and AIR rates and tariffs to become effective as of January 1, 2012 (one set of open access distribution tariffs and one set of standard service tariffs). Consistent with the ESP Stipulation requirement that AEP Ohio maintain separate rates zones for distribution rates until subsequently addressed by the Commission in a separate proceeding, the compliance tariffs reflect two rate zones: Ohio Power and Columbus Southern Power.

Since the ESP Stipulation also involves distinct rate changes to AEP Ohio's transmission service rates and fuel adjustment charges that relate to existing dockets, those compliance tariffs are being separately filed in Case No. 11-2473-EL-RDR (transmission rates) and Case Nos. 11-281-EL-FAC and 11-5906-EL-FAC (fuel rates), respectively.

The Commission should note that, consistent with the ESP Stipulation's resolution of Case Nos. 10-343-EL-ATA and 10-344-EL-ATA, the Emergency Curtailment Service riders were not retained in the compliance tariffs.

The Commission's December 14 Opinion and Order also modified and adopted the ESP Stipulation's resolution for Case No. 10-2929-EL-UNC. Subject to any additional direction from the Commission to implement this aspect of the ESP Stipulation, AEP Ohio is in the process of making a filing before the Federal Energy Regulatory Commission in concert with PJM Interconnection to ensure that Ohio's State Compensation Mechanism under the Reliability Assurance Agreement is administered as modified and adopted by the Commission

An electronic copy of the compliance tariff workpapers is being served upon the parties, in accordance with the Attorney Examiner's December 21, 2011 Entry.

In complying with the Commission's order to file compliance tariffs, AEP Ohio does not waive its right under R.C. 4903 10, to seek rehearing or its right under R.C. 4928 143 (C)(2), regarding withdrawal of its ESP Applications. A determination regarding that latter statute will be made after the Commission issues a final rehearing order (or the existing order becomes final in the event there are no rehearing requests).

Please advise if you have any questions or concerns regarding the compliance tariffs.

Rest Regards

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Letter, Compliance Tariffs and
Workpapers was served by electronic mail upon individuals listed below this 22<sup>nd</sup>
day of December, 2011

Steven T. Nourse

greta.see@puc state oh.us Jonathan Tauber@puc state on us Greg.Price@puc.state.oh us mandy willey@puc state oh us "Bair, Jodi" < Jodi.Bair@puc.state oh.us> "Fortney, Bob" <Bob Fortney@puc state oh us> "McCarter, Doris" < Doris McCarter@puc state oh us> Tammy Turkenton john jones@puc state oh us Werner Margard@puc state oh us "Wright, Bill" <bill wright@puc.state.oh.us> etter@occ.state.oh.us grady@occ state oh us fdarr@mwncmh.com joliker@mwncmh.com dboehm@bkllawfirm.com mkurtz@bkllawfirm com "Montgomery, Christopher" <cmontgomery@bricker.com> "O'Donnell, Terrence" <todonnell@bricker.com> tobrien@Bricker com cmooney2@columbus.rr.com drinebolt@aol com "Bentine, John" <jbentine@cwslaw.com> jlang@calfee.com Imcbride@calfee.com talexander@calfee.com haydenm@firstenergycorp com ricks@ohanet.org dconway@porterwright.com misatterwhite@aep.com msmalz@ohiopovertylaw.org jmaskovyak@ohiopovertylaw.org jejadwin@aep.com lmcalister@bricker.com mwarnock@bricker com dsullivan@nrdc.org myurick@cwslaw.com

ned ford@fuse net sfisk@nrdc.org Henry Eckhart < henryeckhart@aol.com> kpkreider@kmklaw com holly@raysmithlaw com Stephen Chriss@wal-mart.com BarthRoye@aol.com Gary A.Jeffries@dom com mhpetricoff@vorys com smhoward@vorys com mjsettineri@vorys com cmiller@szd.com gdunn@szd.com ahaque@szd.com gthomas@gtpowergroup.com laurac@chappelleconsulting net david.fein@constellation.com cynthia.brady@constellation.com wmassey@cov com pfox@hilliardohio gov sandy.grace@exeloncorp.com jesse rodriguez@exeloncorp.com malina@wexlerwalker.com tsantarelli@elpc.org camille@theoec org nolan@theoec.org trent@theoec.org rplawrence@aep.com aehaedt@jonesday.com dakutik@jonesday.com Philip Sineneng@thompsonhine.com Hand Emma F. Dan Shields gpoulos@enernoc.com <joseph dominguez@exeloncorp.com> Sam Randazzo cathy@theoec org "Zachary D. Kravitz" <zkravitz@cwslaw.com>\ amvogel@aep.com bakahn@vorys.com barthroyer@aol com bill wright@puc state.oh.us bob fortney@puc state oh us callwein@williamsand moser com cmooney2@columbus rr com dboehm@bkllawfirm.com dbweiss@aep.com dconway@porterwright.com doris mccarter@puc state oh us doug bonner@snrdenton.com dsullivan@nrdc.org emma hand@snrdenton.com fdarr@mwncmh.com grady@occ.state oh us haydenm@firstenergycorp com

henryeckhart@aol com

jarutter@aep.com
jbentine@cwslaw com
jlang@calfee.com
jmaskovyak@ohiopovertylaw org
jodi bair@puc state oh us
joliker@mwncmh.com
keith.nusbaum@snrdenton com
lmcalister@bricker com
lmcbride@calfee com
mjlutton@aep.com
mjsatterwhite@aep com
mkurtz@bkllawfirm com
msmalz@ohiopovertylaw org
mwarnock@bricker com
myurick@cwslaw com
ned ford@fuse net
ricks@ohanet.org
sam@mwncmh com
stelpean.erilly@puc state oh us
talexander@calfee.com
werner margard@puc state oh us
zkravitz@cwslaw com
Dave Thomas@hoganlovells com
sauer@occ state oh us
lkalepsclark@vorys com
William wright@puc.state oh.us
Thomas McNamee@puc.state oh us

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in

Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM, 11-0351-EL-AIR,

Summary: Tariff COMPLIANCE TARIFFS (PART 1 OF 3) electronically filed by Mr. Steven T Nourse on behalf of American Electric Power Service Corporation