BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

Marti L. Larkin,	)	
Complainant,	)	
	)	
v.	)	**Case No: 15-0781-EL-CSS**
	)	
Ohio Power Company	)	
Respondent.	)	

Marti L. Larkin,	)	
Complainant,	)	
	)	
v.	)	**Case No: 15-0408-EL-CSS**
	)	
Ohio Power Company	)	
Respondent.	)	

Motion to Consolidate of
Ohio Power Company

Ohio Power Company ("AEP Ohio" of the "Company") respectfully moves that the Commission consolidate Case Nos. 15-0408-EL-CSS (*Larkin I*) with Case No. 15-0781-EL-CSS (*Larkin II*) for purposes of deciding, on an integrated basis, the issues raised in both cases. There are significant benefits that would result from such a consolidation. Both cases make the same claims regarding the same issues arising from the same factual occurrences with the same parties. Additionally, it would be detrimental to both parties to have same the issues dealt with in two separate cases.

A memorandum in support of this Motion is attached.

Respectfully submitted,

/s/ Ajay K. Kumar
Steven T. Nourse
Ajay K. Kumar
American Electric Power Service Corp.
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
akkumar@aep.com

Counsel for Ohio Power Company

Memorandum in Support

AEP Ohio requests that the Commission consolidate Case Nos. 15-0408-EL-CSS (*Larkin I*) with Case No. 15-0781-EL-CSS (*Larkin II*) for purposes of deciding the issues raised on rehearing in both cases, on an integrated basis. There are significant benefits that would result from such a consolidation. Accordingly, the Commission should consolidate the docket for both cases. First, under R.C. 4901.13, the Commission has broad discretion in the conduct of its hearings. *Duff v. Pub. Util. Comm.* (1978), 56 Ohio St. 2d 367, 379, 10 Ohio Op. 3d 493, 500, 384 N.E.2d 264, 273. It is well-settled that pursuant to R.C. 4901.13, the Commission has the discretion to decide how, in light of its internal organization and docket considerations, it may best proceed to manage and expedite the orderly flow of its business, avoid undue delay and eliminate unnecessary duplication of effort. *Toledo Coalition for Safe Energy v. Pub. Util. Comm.* (1982), 69 Ohio St. 2d 559, 560, 23 Ohio Op. 3d 474, 475, 433 N.E.2d 212, 214. *See also Weiss v. Pub. Util. Comm.* (2000), 90 Ohio St. 3d 15, 19 (same). Thus, there can be no question that it is permissible for the Commission to issue an order consolidating both cases.

Not only is it permissible for the Commission to consolidate the docket in these cases, this is in fact a single case that has been filed in two dockets. In *Larkin I*, the Complainant filed a complaint regarding her meter readings and bills from December 2014 through February 2015. In *Larkin II,* the Complainant makes the same claims regarding the meter readings and bills over the same time period. It would be illogical and unfair to both the Company and the Complainant to have what amounts to the same complaint in two different dockets and two different proceedings. Additionally, this would create an unnecessary duplication of the work for the Commission.

For the reasons state above, the Company respectfully requests that the Commission consolidate these claims into a single proceeding.

Respectfully submitted,

 /s/ Ajay K. Kumar
Steven T. Nourse
Ajay K. Kumar
American Electric Power Service Corp.
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
akkumar@aep.com

Counsel for Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Consolidate and Memorandum in Support of

Ohio Power Company was served by regular mail upon Marti L. Larkin at the address listed

below, on this 7th day of May, 2015.

/s/ Ajay K. Kumar
Ajay K. Kumar

Marti L. Larkin
8465 Eldorado Dr.
Powell, OH 43065

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Case No(s). 15-0781-EL-CSS, 15-0408-EL-CSS

Summary: Motion to Consolidate of Ohio Power Company electronically filed by Mr. Ajay K Kumar on behalf of Ohio Power Company