

FILE³

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

Farah Salim,)	
)	
"Complainant,")	
)	Case No. 06-362-EL-CSS
v.)	
)	
AEP,)	
)	
"Respondent.")	

COLUMBUS SOUTHERN POWER COMPANY'S
SECOND ANSWER AND
RENEWED MOTION TO DISMISS

The complaint in this proceeding was filed on February 28, 2006. Columbus Southern Power Company filed its answer and a motion to dismiss on March 27, 2006. By Entry dated April 11, 2006 the Commission denied the motion to dismiss. Further, based on a request by the Complainant, she was given until April 25, 2006 to file written amendments to the original complaint.

On May 1, 2006 the Complainant filed a slightly modified version of the original complaint. Instead of arguing that her monthly electric bill "should always be under \$30/month" (as argued in the original complaint) she now asserts her monthly bill should always be under \$35/month. The only other modification to the original complaint is the addition of the following sentence.

"Monthly and seasonal variations must be noted."

Complainant's most recent filing, which not only was late but also was not served on the Company, does not change the substance of the original complaint. Because of

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that, the Company incorporates its prior answer into this answer and renews its motion to dismiss based on the reasons set forth in its March 27, 2006 filing.

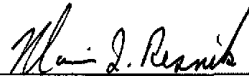
Finally, the Company again requests that the Commission explain to the Complainant that she must make payments on her electric bill in order to avoid disconnection of service. § 4901: 1-18-11, Ohio Admin. Code, provides, in part:

The company shall not refuse service to or disconnect service to any applicant/customer for any of the following reasons:

(C) Failure to pay any amount which is in bona fide dispute. Where the customer has registered a complaint with the commission's public interest center or filed a formal complaint with the commission which reasonably asserts a bona fide dispute, the company shall not disconnect service if the customer pays either the undisputed portion of the bill, if known or can reasonably be determined, or the amount billed for the same billing period in the previous year. (emphasis added)

Complainant cannot reasonably assert that the entire amount of her bills is in dispute. She must make reasonable payments or her service will be disconnected.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Columbus Southern Power Company's Second Answer and Renewed Motion to Dismiss was served upon the Complainant at the address shown below, via first class U.S. Mail, postage prepaid this 8th day of May 2006.



Marvin I. Resnik
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