

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission's)
Review of its Electric Service and)
Safety Standards at Chapter 4901:1-10) Case No. 02-564-EL-ORD
of the Ohio Administrative Code.)

In the Matter of the Commission's)
Review of its Competitive Retail)
Electric Service Standards at Chapter) Case No. 02-565-EL-ORD
4901:1-21 of the Ohio Administrative)
Code.)

**COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S MEMORANDUM CONTRA
WPS ENERGY SERVICES, INC.'S APPLICATION FOR REHEARING**

The Commission has issued two Entries on Rehearing in these dockets. The first was issued on March 18, 2003, the second on May 8, 2003. On June 6, 2003, WPS Energy Services, Inc. (WPS) filed an Application for Rehearing from the second Entry on Rehearing. Columbus Southern Power Company and Ohio Power Company (the Companies) oppose this latest application for the reasons set forth below.

First, regarding § 4901:1-10-29(I)(3), Ohio Admin. Code, the May 8th Entry makes no substantive change from the rule attached to the March 18th Entry. Under both versions, customers on an EDU's arrearage crediting program must be transferred back to standard offer service. The substance of the rule has not changed, only its structure has changed. Therefore, it is too late for WPS to raise this issue.¹

Second, even if the Commission were inclined to reconsider the substance of the rule, it should reject WPS's proposal. The Companies would need to invest time and money to accommodate arrearage crediting program customers switching to or staying

¹ The same concept applies to WPS's arguments concerning § 4901:1-17(B), (D) and (F), Ohio Admin. Code. The May 8th Entry made no change to those rules so the time for seeking rehearing has passed.

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with a CRES provider. Arrearage crediting program customers still are paying off the PIPP arrearage and should be treated as a PIPP customer. The Commission's rule does that and WPS's Application for Rehearing should be denied.

Respectfully submitted,

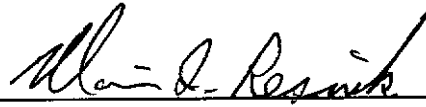


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Columbus Southern Power Company's and Ohio Power Company's Memorandum Contra WPS Energy Services, Inc.'s Application for Rehearing was served this 16th day of June, 2003 on those parties listed below.



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