

file

DUCCO
24 PM 5: 07
-DOCKETING DIV

4

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company for Approval of Electric Transition Plan and Application for Receipt of Transition Revenues)))))))	Case No. 99-1729-EL-ETP
In the Matter of the Application of Ohio Power Company for Approval of Electric Transition Plan and Application for Receipt of Transition Revenues)))))))	Case No. 99-1730-EL-ETP

REPLY COMMENTS OF COLUMBUS SOUTHERN POWER COMPANY
AND OHIO POWER COMPANY REGARDING CONSUMER EDUCATION PLANS

Columbus Southern Power Company and Ohio Power Company (the AEP Companies) submit these reply comments in accordance with the Commission's April 6, 2000, Entry issued in their transition plan proceedings and the proceedings of several other electric utilities. That entry asked whether it is necessary to hold a hearing on the consumer education plans of the AEP Companies and the other electric utilities.

In their initial comments the AEP Companies agreed to include in the proposed consumer education advisory groups a representative of the energy marketers. Having satisfied the only concern that the Staff identified in its March 26, 2000, Report regarding their consumer education plans, the AEP Companies recommended that an evidentiary hearing on their plans is unnecessary.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Jean Scheffler Date Processed 4-25-00

The Ohio Consumers' Counsel (OCC) and the Coalition for Choice in Electricity (CCE) nevertheless have filed initial comments urging the Commission to hold a hearing on the AEP Companies' (and the other electric utilities') consumer education plans. The principle criticism of their comments is that the AEP Companies' plans (and those of the other electric utilities) lack sufficient detail.

These criticisms are not well made. First, the AEP Companies' plans comply with the consumer education objectives that the Legislature outlined in Chapter 4928, Revised Code, and that the Commission further articulated and refined through its consumer education plan rules. The intervenors' criticism really is that the AEP Companies have not provided sufficient detail regarding how the statewide and territory-specific campaigns will unfold. Of course, those details are under development through a process that necessarily is occurring in parallel to but separate from the litigation process. Their criticism is not really directed at the adequacy of the AEP companies' plans. Instead, their complaint is that the implementing consumer education campaigns are, as they necessarily must be, a work in progress.

More importantly for purposes of addressing the Commission's question, OCC and CCE's position should be rejected because they do not explain how holding an evidentiary hearing on the AEP Companies' consumer education plans will advance the goal of communicating effectively and in a timely manner to consumers that they have a choice of electric suppliers. In fact, evidentiary hearings on the electric utilities' plans will not help to achieve that goal.

Respectfully submitted,

Marvin I. Resnik /DEC

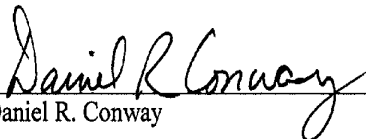
Edward J. Brady, Esq.
Kevin F. Duffy, Esq.
Marvin I. Resnik, Esq.
Trial Attorney
American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215
614-223-1606
Fax: 614-223-1687
Email: miresnik@aep.com

Daniel R. Conway
Porter Wright Morris & Arthur
41 South High Street
Columbus, Ohio 43215-6194
614-227-2000
Fax: 614-227-2100
Email: dconway@porterwright.com

Attorneys for Columbus Southern Power
Company and Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Columbus Southern Power Company and Ohio Power Company Regarding Consumer Education Plans was served by e-mail and First Class U.S. Mail upon counsel for all parties of record in this case, on this 24th day of April, 2000.


Daniel R. Conway