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FILED  
PUBLIC UTILITY COMMISSION

APPLICATION OF AEP TEXAS § BEFORE THE PUBLIC UTILITY  
NORTH COMPANY TO ADJUST § COMMISSION OF TEXAS  
ENERGY EFFICIENCY COST § AND  
RECOVERY FACTOR AND RELATED § THE STATE OFFICE OF  
RELIEF § ADMINISTRATIVE HEARINGS

**RESPONSE OF AEP TEXAS NORTH COMPANY TO THE REQUEST FOR  
CERTIFIED ISSUE CONCERNING ALLOCATION OF CITY RATE CASE EXPENSES**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS AND THE  
ADMINISTRATIVE LAW JUDGE:

NOW COMES AEP Texas North Company (TNC) and files this response to the joint  
motion for certified issue filed July 18, 2012 by the Steering Committee of Cities Served by  
TNC (Cities).

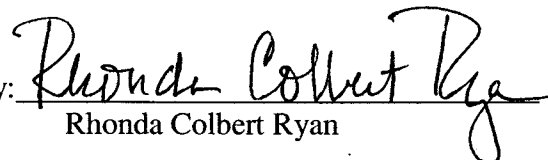
The Commission decided in its Supplemental Preliminary Order that city rate case  
expenses should be allocated only to the ratepayers in the cities that participate in the  
proceedings and not to all ratepayers of the utility. That order is not subject to being revisited at  
this stage of the proceeding, whether through a motion for reconsideration or a certified question.  
While Cities characterize their request as a clarification of the Supplemental Preliminary Order, a  
review of their arguments reveals that the request is in fact a request for reconsideration of that  
order. The Supplemental Preliminary Order specifically states that it is not subject to motions for  
rehearing or reconsideration.

Therefore, the request to certify the issue should be denied.

Dated: July 20, 2012

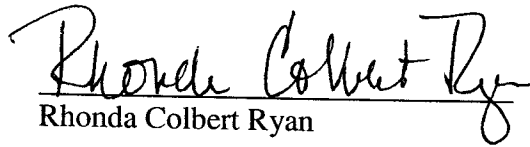
RESPECTFULLY SUBMITTED,

American Electric Power  
400 West 15<sup>th</sup> Street, Suite 1520  
Austin, Texas 78701  
Rhonda Colbert Ryan  
State Bar No. 17478800  
Telephone: (512) 481-3321  
Facsimile: (512) 481-4591

By:   
Rhonda Colbert Ryan

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand-delivery, overnight delivery, facsimile transmission, or U.S. first-class mail on the 20<sup>th</sup> day of July, 2012.

  
Rhonda Colbert Ryan