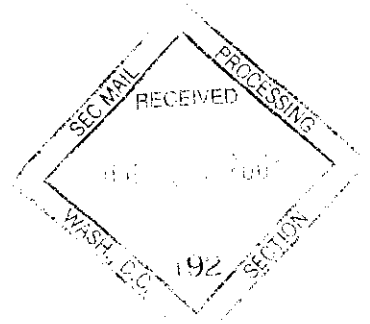


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

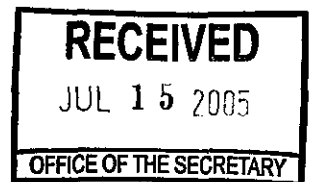


In the Matter of

AMERICAN ELECTRIC POWER COMPANY, INC.

Administrative Proceeding
File No. 3-11616

**Request For Oral Argument of
American Electric Power Company, Inc.**



Pursuant to Rule 451 of the Commission's Rules of Practice, American Electric Power Company, Inc. ("AEP") requests that the Commission hold oral argument on the issues that are the subject of the petitions for review of the May 3, 2005, Initial Decision in this proceeding. The Commission should hold oral argument because the petitions for review raise issues that are critical for AEP as the applicant, critical to the future structure of the electric power industry, and critical to the Commission's overall administration of the Public Utility Holding Company Act ("Act") in a period of electric industry restructuring.

By Order dated, June 7, 2005, the Commission granted the petitions for review of the Initial Decision, including AEP's petition for review of the finding that the combined system of AEP and Central and Southwest Corporation ("Combined System") does not operate within a single area or region of the United States and therefore that AEP's application to acquire the


CSW system should be denied. AEP filed its Opening Brief on this issue on July 7, 2005.

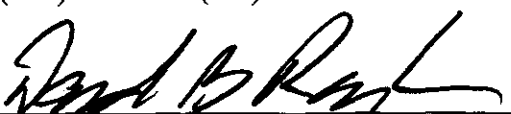
Opposition briefs are due to be filed on August 7, 2005.

Rule 451(a) states that the Commission will hold oral argument “unless exceptional circumstances make oral argument impractical or inadvisable.” No such circumstances exist here. In fact, the opposite is true; oral argument is appropriate here because of the importance of the issues raised by the petitions for review. Obviously, the petitions for review are of critical importance to AEP as they may affect the future status of AEP’s acquisition of CSW, which was consummated in 2000 based on the Commission’s prior approval of the acquisition under Section 10 of the Act. The issues raised by the petitions are also critical to the Commission’s administration of the Act. If the Initial Decision is upheld, the Act will have been interpreted to erect strict geographic limitations on the size of holding companies, which may affect prospective mergers that have already been announced and others that may occur in the future. It could also call into question other merger transactions that the Commission approved in the past. The geographic limitations on holding companies that are recommended in the Initial Decision also run against the grain of the major changes that are occurring in the electric industry today as a result of regulatory policies that have promoted broad geographic markets for electricity.

For the foregoing reasons, the Commission should grant this request and provide for oral argument on the issues raised by the petitions for review in this proceeding.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of July 2005, I served the foregoing document via first class mail, postage prepaid, upon the persons listed below.



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