

Indiana Michigan Power
P.O. Box 60
Fort Wayne, IN 46801
IndianaMichiganPower.com



A unit of American Electric Power

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P. O. Box 30221
Lansing, MI 48909

January 30, 2009

Dear Ms. Kunkle:

Enclosed please find the January 2009 Code of Conduct Compliance Report (Report) of Indiana Michigan Power Company (I&M) submitted in accordance with the Commission's Order on Rehearing of October 29, 2001, and its Opinion and Order of October 3, 2002, in Case No. U-12134.

I&M's Report responds to code sections II.G. and VII.C. and I&M's Code of Conduct Compliance Plan, which call for the periodic filing of information with the Commission.

Please contact me at 260-425-2119 or kdcurry@aep.com if you have any questions regarding I&M's Report.

Sincerely,

Kent D. Curry
Director of Regulatory Services

Enclosures

INDIANA MICHIGAN POWER COMPANY

JANUARY 2009 CODE OF CONDUCT COMPLIANCE REPORT

Code Section II.G.

An electric utility may transfer employees between the electric utility and any of its affiliates or other entities within the corporate structure as long as the electric utility documents those transfers and files semi-annually with the Commission a report of each occasion on which an employee of the electric utility became an employee of an affiliate or other entity within its corporate structure and/or an employee of an affiliate or other entity within its corporate structure became an employee of the electric utility.

Compliance Measure

Please refer to Attachment II.G. for a listing of the 2008 employee transfers from/to Indiana Michigan Power Company. All 2008 transfers were initiated by management and predominately result from AEP's policy that when an employee primarily performs services for one operating company and incidentally for another, the person performing such services is registered on the payroll of the first operating company with the cost of the incidental services billed to the second company in accordance with a cost sharing agreement. When an employee's assigned duties involve the regular rendering of services to two or more operating companies, the person is registered as an employee of the AEP Service Corporation.

Code Section VII.C.

Each electric utility or alternative electric supplier shall file an annual report with the commission summarizing the number and types of complaints received and their resolution.

Compliance Measure

No complaints were received during 2008 regarding the compliance of Indiana Michigan Power Company with the Code of Conduct.

Transfers From and To Indiana Michagan Power

01/01/2008 - 12/31/2008

TRANSFERS FROM INDIANA MICHIGAN POWER

Name	Eff Date of Transfer	Previous Company	New Company	Previous Job Title	New Job Title
Swart,Mark D	2008-01-14	Indiana Michigan Power Company	AEP Service Corporation	Training Instructor	Learning Coordinator I
Odom,Lesley K	2008-04-07	Indiana Michigan Power Company	AEP Service Corporation	Administrative Associate	Supv Customer Solutions Ctr
Boraby,Mike	2008-05-17	Indiana Michigan Power Company	Ohio Power Company	Technician I	Technician I
Coleman,Christopher C	2008-05-30	Indiana Michigan Power Company	AEP Service Corporation	Energy Prod & Maint Supv III	Energy Prod & Maint Supv III
Rodriguez Jr.,Candido	2008-06-29	Indiana Michigan Power Company	AEP Texas Central Company	Network Mechanic A	Network Mechanic A
Vought,Michael A	2008-06-30	Indiana Michigan Power Company	AEP Service Corporation	Co-Op Student Computer Science	Co-Op Student Computer Science
Hackman, Richard B	2008-07-26	Indiana Michigan Power Company	AEP Service Corporation	Shift Technical Advisor-Senior	Principal Coordinator
Pence,Clark D	2008-09-22	Indiana Michigan Power Company	Columbus Southern Power Co	Network Mechanic A	Training Specialist
Lewis,Michael W	2008-10-04	Indiana Michigan Power Company	AEP Service Corporation	Mgr Supply Chain Operations	Mgr Supply Chain Operations
Fatley Jr., Wayne C	2008-11-17	Indiana Michigan Power Company	AEP Service Corporation	Mgr Fleet Administrative Svcs	Mgr Fleet Administrative Svcs

TRANSFERS TO INDIANA MICHIGAN POWER

Name	Eff Date of Transfer	Previous Company	New Company	Previous Job Title	New Job Title
Daubenmire, Timothy G	2008-01-26	Columbus Southern Power Co	Indiana Michigan Power Company	Line Crew Supervisor - NE	Training Specialist
Petrowsky Jr.,Anthony	2008-02-23	AEP Service Corporation	Indiana Michigan Power Company	Mgr-FGD Engineering	Dir Design Engineering X
Clark, Jennifer S	2008-03-08	AEP Service Corporation	Indiana Michigan Power Company	Sr Customer Solutions Assoc	Administrative Associate
Maxwell, Sara M	2008-03-08	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	Administrative Associate I
Baker, Kelly S	2008-03-08	AEP Service Corporation	Indiana Michigan Power Company	Engineer I	Engineer I
LeCoque, Paul A	2008-04-19	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	MRO Servicer
Lynn, Timothy D	2008-05-03	AEP Service Corporation	Indiana Michigan Power Company	Sr Customer Solutions Assoc	Material Handler B
Martin, Hope A	2008-05-03	AEP Service Corporation	Indiana Michigan Power Company	Project Manager III-Gen	Project Manager
Kabbani, Mohamad Z	2008-05-17	AEP Service Corporation	Indiana Michigan Power Company	Engineer III	Engineer III
Vielhuber, Andrew J	2008-05-17	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	Network Mechanic D
Hall II, Gary F	2008-05-31	Columbus Southern Power Co	Indiana Michigan Power Company	Technician Senior	Supv Customer Design
LeCoque, Paul A	2008-05-31	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	Network Mechanic D
Putt, Erica H	2008-06-28	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	Administrative Associate
Bergfeld, David P	2008-08-09	Ohio Power Company	Indiana Michigan Power Company	Line Servicer	Distribution Line Specialist
Walters, Teresa E	2008-09-20	AEP Service Corporation	Indiana Michigan Power Company	Administrative Associate	Administrative Associate
Rhoades, Jason L	2008-10-04	Ohio Power Company	Indiana Michigan Power Company	Line Mechanic-A	Safety Coordinator
Magnuson, Betty L	2008-10-04	AEP Service Corporation	Indiana Michigan Power Company	Customer Solutions Assoc	Administrative Associate I
Bernard, Nickoli D	2008-10-18	AEP Service Corporation	Indiana Michigan Power Company	Administrative Associate	Access Control/FFD Coord
Benson, Terry A	2008-11-01	AEP Service Corporation	Indiana Michigan Power Company	Tech Svcs Sr Planner	Maintenance Supv III
Jenkins, Mark D	2008-12-13	AEP Service Corporation	Indiana Michigan Power Company	Mgr-Engineering Projects X	Mgr-Engineering Projects X