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February 28, 2018

Kavita Kale
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
3rd Floor
Lansing, MI 48917

Re: U-12134
I&M's Annual Code of Conduct Report

Dear Ms. Kale:

Attached please find I&M's 2018 Code of Conduct Compliance Report. If you have any questions, contact Richard Aaron.

Thank you.

Sincerely,

DYKEMA GOSSETT PLLC

Richard J. Aaron

Attachment

INDIANA MICHIGAN POWER COMPANY

FEBRUARY 2018 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 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 2017 employee transfers to/from Indiana Michigan Power Company.

NAME	EFF_DATE_OF_TRANSF	PREVIOUS_COMPANY	NEW_COMPANY	PREVIOUS_JOB_TITLE	NEW_JOB_TITLE
Chodak III,Paul	1/1/2017	Indiana Michigan Power Compa	AEP Service Corporation	President & COO - IN/MI	EVP Utilities
Newport,Chad E	1/2/2017	Indiana Michigan Power Compa	AEP Service Corporation	Instrument & Control Tech-Sr	Equipment Specialist
Horeled,Matthew A	2/25/2017	Indiana Michigan Power Compa	Kentucky Power Company	Regulatory Analysis & Case M	Dir Business Opers Suppt
Wright,Matthew D	2/25/2017	Indiana Michigan Power Compa	Public Service Co. of OK	Dist Dispatcher Sr	Electric System Operator
Hovious,Timothy H	3/11/2017	Indiana Michigan Power Compa	AEP Service Corporation	IT Network Consultant	IT Network Consultant
Adamson,Lynn M	4/22/2017	Indiana Michigan Power Compa	AEP Service Corporation	EE&Consumer Program Coord	Cust Prog Service Analyst Sr
Minnick,Leah D	7/1/2017	Indiana Michigan Power Compa	AEP Service Corporation	Supply Chn Field Ops Assc	Supply Chn Field Ops Assc
Herman,Rachel Ann	7/15/2017	Indiana Michigan Power Compa	AEP Service Corporation	MRO Specialist	Supply Chn Field Ops Assc
Yoquelet,Travis Jonathar	7/29/2017	Indiana Michigan Power Compa	AEP Service Corporation	Equipment Specialist	Engineering Technologist
Lippert,Fred R	7/31/2017	Indiana Michigan Power Compa	AEP Service Corporation	FDB Inspector Spec	FDB Inspector Spec
Rippa,Derek D	7/31/2017	Indiana Michigan Power Compa	AEP Service Corporation	Auxiliary Equipment Operator	Auxiliary Equipment Operator
Hale,Michael M	8/12/2017	Indiana Michigan Power Compa	AEP Service Corporation	Transmission Line Mechanic-A	Trans Field Srvcs Coord
Gotschall,Jordan T	8/26/2017	Indiana Michigan Power Compa	AEP Service Corporation	Dist Line Coord	Functional System Analyst Sr
Farris,Jonathan Ryan	8/26/2017	Indiana Michigan Power Compa	Appalachian Power Company	Line Mechanic-C	Line Mechanic-C
Wagner,Gabriel D	9/23/2017	Indiana Michigan Power Compa	AEP Service Corporation	Station Crew Supv NE	Trans Fld Srvcs Scheduler Sr
Robinson,Mark A	9/23/2017	Indiana Michigan Power Compa	SouthWestern Electric Power C	Community Affairs Mgr	External Affairs Mgr
Strelecky,Michael J	10/21/2017	Indiana Michigan Power Compa	AEP Service Corporation	Station Electrician C	Trans Construction Rep
Karber,Richard L	12/16/2017	Indiana Michigan Power Compa	AEP Service Corporation	Region Forestry Supv	Region Forestry Supv
Blye,Darius E	12/29/2017	Indiana Michigan Power Compa	AEP Generating Company	Maintenance Supv	Operations Supv

NAME	EFF_DATE_OF_TRANSF	PREVIOUS_COMPANY	NEW_COMPANY	PREVIOUS_JOB_TITLE	NEW_JOB_TITLE
Thomas,Toby L	1/1/2017	AEP Generation Resources	Indiana Michigan Power Compa	VP Competitive Generation	President & COO - IN/MI
Yoquelet,Travis Jonathar	1/14/2017	AEP Service Corporation	Indiana Michigan Power Compa	Engineering Technologist	Equipment Specialist
Baker,Jason E	2/11/2017	AEP Service Corporation	Indiana Michigan Power Compa	Gen Asst Project Mgr Sr	Dist Project Mgr Prin
Buzard,Cynthia A	2/25/2017	Ohio Power Company	Indiana Michigan Power Compa	Technician Sr	Dist Line Coord
Garbash,James E	2/25/2017	Wheeling Power Company	Indiana Michigan Power Compa	Meter Revenue Opers Sup	Meter Revenue Opers Mgr
Guthrie,Tanner L	5/6/2017	AEP Service Corporation	Indiana Michigan Power Compa	Trans Right of Way Agent	Regulatory Consultant
Williams,Glen R	6/17/2017	AEP Service Corporation	Indiana Michigan Power Compa	Gen Project Mgr Prin	Dist Projects Mgr Staff
Heishman,Diana M	7/15/2017	AEP Service Corporation	Indiana Michigan Power Compa	Administrative Asst Sr	Cust Svcs Acct Rep Assc
Steinebach,Adam E	8/12/2017	AEP Service Corporation	Indiana Michigan Power Compa	Customer Ops Assoc	MRO Specialist
Freas,Jeremy Dane	9/9/2017	AEP Service Corporation	Indiana Michigan Power Compa	Customer Ops Assc Sr	Dist Dispatcher Assc
Turner,Rebecca D	9/9/2017	AEP Service Corporation	Indiana Michigan Power Compa	Customer Ops Assc Sr	Bus Ops Support Asst
Beggs,Maggie R	12/30/2017	AEP Service Corporation	Indiana Michigan Power Compa	Proj Outreach Specialist	Community Affairs Mgr

INDIANA MICHIGAN POWER COMPANY

FEBRUARY 2018 CODE OF CONDUCT COMPLIANCE REPORT

Code Section VI.

Each electric utility and alternative electric supplier shall file a code of conduct compliance plan within 90 days of the approval of this code of conduct by the Commission. The electric utility or alternative electric supplier shall update the compliance plan annually. The compliance plan shall:

- A. Designate a corporate officer of the electric utility or alternative electric supplier who will oversee compliance with the code of conduct and be available to serve as the Commission's primary contact regarding compliance with the code.
- B. Include an affidavit signed by the designated corporate officer certifying that the electric utility or alternative electric supplier will comply fully with the code of conduct.
- C. Include a clear organization chart of the parent or holding company showing all regulated entities and affiliates and a description of all services and products provided between the regulated entity and its affiliates.

Compliance Measure

- A. **Designation of Corporation Officer.** I&M designates Gina E Mazzei-Smith, Chief Compliance Officer, American Electric Power Service Corporation (AEPSC) to oversee compliance with the Code of Conduct and to serve as the Commission's primary contact regarding compliance with the Code.
- B. **Affidavit.** Please refer to Attachment VI (B) for an affidavit signed by Ms. Mazzei-Smith stating that I&M will fully comply with the Code of Conduct.
- C. **Organization Chart.** Please refer to Attachment VI (C) for an organization chart of American Electric Power Company, Inc. and all regulated entities and affiliates and a description of all services and products provided between I&M and its affiliates as of December 31, 2017.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the approval of a code)
of conduct for Consumers Energy Company) Case No. U-12134
and The Detroit Edison Company.)
_____)

Affidavit of Gina E Mazzei-Smith

State of Ohio)
County of Franklin)

Gina E Mazzei-Smith, being first duly sworn according to law, deposes and says:

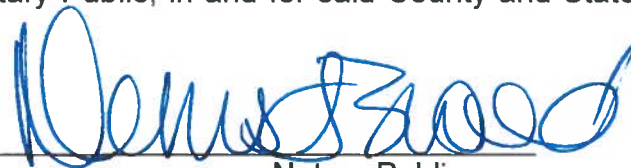
1. I am Chief Compliance Officer for American Electric Power (AEP). I am responsible for designing, implementing and administering AEP's ethics and compliance programs.
2. I have read and am familiar with Indiana Michigan Power Company's (I&M) Code of Conduct Plan, filed with the Michigan Public Service Commission.
3. I&M will fully comply with the Compliance Plan.

Further Affiant Sayeth Naught.



Gina E Mazzei-Smith

Subscribed and sworn to before me, a Notary Public, in and for said County and State this 20th day of February 2018.



Notary Public

I am a resident of Franklin County, Ohio.
My commission expires: 12/25/18



Denise L. Wood
Notary Public, State of Ohio
My Commission Expires 12-25-2018

SYSTEM COMPANIES As of December 31, 2017		
COMPANY NAME		Purpose of Company
00.	American Electric Power Company, Inc.	Parent holding company of all companies in the AEP system.
01.	AEP Coal, Inc.	Parent company of several inactive coal mining subsidiaries.
02.	AEP Kentucky Coal, LLC	A subsidiary of AEP Coal, Inc., active mining operation assets were sold in 2004, and now only engaged in coal property reclamation activities.
02.	Snowcap Coal Company, Inc.	An inactive subsidiary of AEP Coal, Inc.; formerly engaged in coal mining in Colorado; currently completing mine reclamation activities.
01.	AEP Credit, Inc.	A special purpose subsidiary that factors accounts receivables for affiliated domestic electric utility companies.
01.	AEP Energy Supply LLC	This entity is a nonregulated holding company for AEP Generation Resources Inc. at corporate separation.
02.	AEP C&I Company, LLC	Holds investments in deregulated retail operations in multiple states.
03.	AEP Retail Energy Partners LLC	As of 9/1/13, all retail customers have been moved to AEP Energy and all competitive retail activity is recorded on BU 400 going forward. [Was a CRES provider in the deregulated retail energy market segment of Ohio.]
04.	AEP Energy, Inc.	Formerly BlueStar Energy Services, Inc., a retail electricity supplier, based in Chicago, IL, supplying electricity to business and residential customers.
04.	BSE Solutions LLC	Services company that provides support services for retail electric sales, such as vendor, software and brokering services.
02.	AEP Energy Partners, Inc.	A power marketer active in wholesale power markets in ERCOT and PJM, where it primarily procures wholesale supply for AEP Retail Energy.
02.	AEP Generation Resources Inc.	Formed for the purpose of owning and operating electric generation and related facilities.
03.	Cardinal Operating Company	A jointly owned subsidiary of AEP Generation Resources and nonaffiliated partner Buckeye Power, Inc. that owns Cardinal Generation Station located in Jefferson County, Ohio.
03.	Conesville Coal Preparation Company	Leased and operated a coal washing facility near Conesville, Ohio to clean coal for the Conesville Power Plant. Ceased operations at the end of 2011.
03.	Ohio Franklin Realty, LLC	Ohio Franklin Realty, LLC was formed to hold interests in real estate and personal property for the benefit of AEP Generation Resources Inc. This is the same function that Franklin Real Estate Company and Indiana Franklin Realty, Inc. perform for the operating companies of the AEP System. The basic concept is there needs to be separation of such functions between the regulated utilities and the merchant generation function.
04	Central Coal Company (Inactive)	Inactive jointly owned coal-mining subsidiary of Appalachian Power Company and AEP Generation Resources. The mining assets were sold in 2004 - 2005.
02.	AEP OnSite Partners, LLC	AEP OnSite Partners will focus on growing the company's distributed resource portfolio through partnering directly with wholesale and large retail customers to provide tailored solutions for customers on their sites. The Clyde (Ohio) Solar Energy Center is AEP OnSite Partners' first project; the company will design, build, own and operate the 3.6-megawatt facility.
03.	Century West PNL, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Dynasty PNL, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Garnet Solar Partners, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Imboden II Solar, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Imboden III Solar, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Kamaaha PNL, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Kona CE, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	NM Renewable Development, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
04	NMRD Data Center, LLC	To record activity associated with this new LLC which will have three Facebook solar projects in NM.
03.	Northwest Jacksonville Solar Partners, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Quincy II Solar Garden, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
03.	Rutland Renewable Energy, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.

		COMPANY NAME	Purpose of Company
	03.	Sunset Lakeview PNL, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
	03.	SoCore Sherburne 1, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
	03.	Twin Lantern Solar Partners, LLC	To create an AEP Company to develop renewable energy projects and house investments in customer solutions utilizing existing and emerging distributed technologies.
	02.	AEP Renewables, LLC	Business created to develop/invest in large community scale renewables projects. Initially to include solar and wind projects with storage. Other options to be explored in the future.
	03.	Boulder Solar II, LLC	Boulder is a part of AEP Renewables. AEP Renewables was created to develop or invest in universal solar and wind energy projects to meet customer interest in clean energy at grid scale.
	03.	Jacumba Solar, LLC	Jacumba is a part of AEP Renewables. AEP Renewables was created to develop or invest in universal solar and wind energy projects to meet customer interest in clean energy at grid scale.
	03.	Pavant Solar III, LLC	Pavant is a part of AEP Renewables. AEP Renewables was created to develop or invest in universal solar and wind energy projects to meet customer interest in clean energy at grid scale.
	02.	CSW Energy, Inc.	Holds investments in wind power generation facilities in Texas and markets power in the nonregulated ERCOT market.
	03.	AEP Desert Sky GP, LLC	Holds a 1% investment in Desert Sky Wind Farm LP.
	04.	Desert Sky Wind Farm LLC	A limited partnership that holds the investment in the Desert Sky Wind Farm, a 160.5 MW wind powered generating facility in Pecos County, Texas.
	03.	AEP Desert Sky LP II, LLC	Holds a 99% investment in Desert Sky Wind Farm LP.
	04.	Desert Sky Wind Farm LLC	A limited partnership that holds the investment in the Desert Sky Wind Farm, a 160.5 MW wind powered generating facility in Pecos County, Texas.
	03.	AEP Wind Holding, LLC	Formed to hold subsidiaries that own interests in the Trent Wind Farm generating facility and provides project management services to Trent Wind Farm LP and Desert Sky Wind Farm LP.
	04.	AEP Properties, LLC	Formed as a land holding entity for Trent Wind Farm LP.
	04.	AEP Wind GP, LLC	Holds a 1% equity investment in Trent Wind Farm LP.
	05.	Trent Wind Farm, LLC	A limited partnership subsidiary of AEP Wind LP II, LLC and AEP Wind GP, LLC that owns the Trent Wind Farm, a 150 MW wind powered generating facility near Sweetwater, TX.
	04.	AEP Wind LP II, LLC	A subsidiary of AEP Wind Holding, LLC that holds an equity investment in Trent Wind Farm LP.
	05.	Trent Wind Farm, LLC	A limited partnership subsidiary of AEP Wind LP II, LLC and AEP Wind GP, LLC that owns the Trent Wind Farm, a 150 MW wind powered generating facility near Sweetwater, TX.
	01.	AEP Generating Company	Owns Lawrenceburg Plant, a combined cycle natural-gas power plant, and one unit of the Rockport Plant, and sells electricity from those plants to certain AEP operating companies located in PJM.
	01.	AEP Investments, Inc.	Holds investments in companies offering advanced energy technologies, energy management, or other energy related activities.
	02.	AEP Energy Services, Inc.	Primarily engaged in natural gas marketing and related services.
	03.	AEP Energy Services Gas Holding Company	Held the investments in the Houston Pipe Line and Louisiana Intrastate Gas chain of companies prior to divestiture.
	02.	Braemar Energy Ventures III, LP	Venture capital fund that makes equity investments in early and growth stage businesses that focus primarily on developing, enabling and core technologies for the energy and energy services industry. The fund invests in energy technology companies with technologies that are expected to contribute either directly or indirectly to greater energy efficiency, lower energy costs and/or reduced environmental impact.
	02.	Columbus Collaboratory LLC	To learn, collaborate, explore and attract and retain talent, and to engage in any lawful act or activity for which limited liability companies may be organized and incorporated under Ohio law. The Company will provide continuing education for employees of Member companies, train students in partnership with universities, recruit interns, discover and drive operation synergies in cybersecurity, call center operations, and data analytics and share best practices in these areas, sponsor research projects to benefit Member companies, develop and commercialize intellectual property, and recruit new talent and retain them in the central Ohio area.
	02.	GridEdge Networks, Inc.	An investment by AEP Investments, Inc. GridEdge Networks was formed to develop and test broadband power line carrier communication devices for medium voltage distribution lines.
	02.	Utilidata, Inc.	An AEP investment, Utilidata is a global software company that utilizes patented technologies to leverage real-time information about the electric grid. AEP has no control over the operations of Utilidata
	01.	AEP Nonutility Funding LLC	Funds the Nonutility Money Pool.
	01.	AEP Pro Serv, Inc.	Professional services company that provides project management, environmental licensing, permitting, engineering, construction, operations, and other technical services to both affiliates and nonaffiliated customers.

		COMPANY NAME	Purpose of Company
	02.	United Sciences Testing, Inc.	Provides field services and test equipment to perform relative accuracy test audits (RATA) on boiler flue gas monitoring systems for electric generating plants of affiliates and nonaffiliates.
	01.	AEP T&D Services, LLC	Provides transmission and distribution, construction and maintenance services to third parties.
	01.	AEP Texas, Inc	Formerly Central and South West Corporation and formerly AEP Utilities, Inc; holding company of subsidiaries AEP Texas Central Company, AEP Texas North Company and holds a 49.5% partnership interest in Electric Transmission Texas, LLC.
	02.	AEP Texas Central Transition Funding II LLC	Special purpose entity formed to issue securitization bonds (asset backed securities). The only asset is the right to receive transition charges from AEP Texas Central Transition Company's distribution customers.
	02.	AEP Texas Central Transition Funding III LLC	Special purpose entity formed to issue securitization bonds (asset backed securities). The only asset is the right to receive transition charges from AEP Texas Central Transition Company's distribution customers.
	02.	AEP Texas Central Transition Funding LLC	Special purpose entity formed to issue securitization bonds (asset backed securities). The only asset is the right to receive transition charges from AEP Texas Central Transition Company's distribution customers.
	02.	AEP Texas North Generation Company, LLC	Holds mothballed generation facilities pending disposition.
	01.	AEP Transmission Holding Company, LLC	AEP Transmission Holding Company is a subsidiary of AEP and the holding company for AEP Transmission Company (parent of the state transcos and the transmission joint ventures)
	02.	AEP Transmission Company, LLC	Holds investments in various transmission projects.
	03.	AEP Appalachian Transmission Company, Inc.	Formed for the purpose of developing and operating a transmission-only public utility in the state of Virginia.
	03.	AEP Indiana Michigan Transmission Company Inc.	Formed for the purpose of developing and operating a transmission-only public utility in the states of Indiana and Michigan.
	03.	AEP Kentucky Transmission Company, Inc.	Formed for the purpose of developing and operating a transmission-only public utility in the state of Kentucky.
	03.	AEP Ohio Transmission Company Inc.	Formed for the purpose of developing and operating a transmission-only public utility in the state of Ohio.
	03.	AEP Oklahoma Transmission Company, Inc.	A subsidiary of AEP Transmission Company, LLC formed in Oklahoma in 2009 to hold investments in transmission projects in Oklahoma.
	03.	AEP Southwestern Transmission Company, Inc.	A subsidiary of AEP Transmission Company, LLC formed to hold investments in transmission projects in Louisiana and Arkansas.
	03.	AEP West Virginia Transmission Company, Inc.	Formed for the purpose of developing and operating a transmission-only public utility in West Virginia.
	02.	AEP Transmission Partner LLC	Organized to hold a minority interest in transmission-related joint venture partnerships.
	03.	Electric Transmission America, LLC	A 50/50 joint venture between AEP Transmission Holding Company, LLC and non-affiliate MEHC America Transco, LLC to identify and invest in high-voltage transmission projects (345-kilovolt or higher) located in North America outside of ERCOT.
	04.	Prairie Wind Transmission, LLC	A joint venture between Electric Transmission America, LLC (ETA) and Westar Energy, Inc. to build approximately 110 miles of 765kV transmission line in southern Kansas.
	03.	Electric Transmission Texas, LLC	A 50-50 joint venture between AEP Utilities, Inc. and non-affiliate MEHC Texas Transco, LLC to invest and operate electric transmission facilities in the ERCOT region of Texas.
	02.	Bold Transmission LLC	BOLD (Breakthrough Overhead Line Design) is a patented transmission line that increases the efficiency and power transport of transmission lines.
	02.	Electric Transmission America, LLC	A 50/50 joint venture between AEP Transmission Holding Company, LLC and non-affiliate BHE U.S. Transmission to identify and invest in high-voltage transmission projects (345-kilovolt or higher) located in North America outside of ERCOT.
	03.	Prairie Wind Transmission, LLC	A joint venture between Electric Transmission America, LLC (ETA) and Westar Energy, Inc. to build approximately 110 miles of 765kV transmission line in southern Kansas.
	02.	Electric Transmission Texas, LLC	A 50-50 joint venture between AEP Utilities, Inc. and non-affiliate BHE U.S. Transmission to invest and operate electric transmission facilities in the ERCOT region of Texas.
	02.	Grid Assurance LLC	A joint venture company formed to own, maintain and deploy spare equipment, including critical, long lead time equipment required for transmission facilities.
	02.	PATH West Virginia Series	Formed to design and build 224 miles of extra high voltage 765 kV transmission lines in West Virginia.
	03.	PATH West Virginia Transmission Company, LLC	Owned by Potomac-Appalachian Transmission Highline, LLC (West Virginia Series) to design and build 224 miles of extra high voltage 765 kV transmission lines in West Virginia.
	02.	Pioneer Transmission, LLC	A 50-50 joint venture between AEP Transmission Holding Company, LLC and Duke Energy Transmission Holding Company, LLC formed in 2008 to construct, own, and operate transmission assets within the state of Indiana. The initial project is the construction of approximately 240 miles of transmission lines connecting the I&M Rockport station and The Duke Greentown station.
	02.	Potomac-Appalachian Transmission Highline, LLC	A series LLC jointly formed by AEP Transmission Holding Company, LLC and AET PATH Company, LLC, a subsidiary of Allegheny Energy formed in 2007 to design and build 224 miles of extra high voltage 765 kV transmission lines in West Virginia.

		COMPANY NAME	Purpose of Company
	02.	RITELine Indiana, LLC	Joint Venture to develop, construct, own and operate Indiana portion of 765kV transmission lines and related facilities connecting AEP's 765kV system in Indiana to Exelon's 765kV system in Illinois.
	02.	RITELine Transmission Development, LLC	Joint Venture to develop, construct, own and operate approximately 420 miles of 765kV transmission lines and related facilities connecting AEP's 765kV system in Indiana to Exelon's 765kV system in Illinois west of Chicago.
	03.	RITELine Illinois, LLC	Joint Venture to develop, construct, own and operate Illinois portion of 765kV transmission lines and related facilities connecting AEP's 765kV system in Indiana to Exelon's 765kV system in Illinois.
	03.	RITELine Indiana, LLC	Joint Venture to develop, construct, own and operate Indiana portion of 765kV transmission lines and related facilities connecting AEP's 765kV system in Indiana to Exelon's 765kV system in Illinois.
	02.	Transource Energy, LLC	Entity formed with Great Plains Energy for the purpose of pursuing competitive transmission projects in the continental U.S.
	03.	Golden State Transmission, LLC	Entity formed to participate in certain California competitive transmission projects. Its activity will initially be limited to submitting proposals in response to RFPs for the CA competitive projects.
	03.	Transource Delaware, Inc.	Transource Delaware was formed in Delaware because Delaware requires a company pursuing business in their state to be domiciled in Delaware. It will develop transmission projects in Delaware.
	03.	Transource Illinois, LLC	Transource Illinois was formed in Illinois because Illinois requires a company pursuing business in their state to be domiciled in Illinois. It will develop transmission projects in Illinois.
	03.	Transource Indiana, LLC	Transource Indiana was formed in Indiana because Indiana requires a company pursuing business in their state to be domiciled in Indiana. It will develop transmission projects in Indiana.
	03.	Transource Kansas, LLC	A Transource Energy LLC subsidiary formed for the purpose of developing, constructing and owning high voltage transmission in Kansas.
	03.	Transource Kentucky, LLC	Formed to provide support to Transource Energy in the state of Kentucky
	03.	Transource Maryland, LLC	Formed to provide support to Transource Energy in the state of Maryland.
	03.	Transource Michigan, Inc.	Transource Michigan was formed in Michigan because Michigan requires a company pursuing business in their state to be domiciled in Michigan. It will develop transmission projects in Michigan.
	03.	Transource Missouri, LLC	Joint venture formed for the purpose of developing, constructing and owning high voltage transmission in Missouri.
	03.	Transource New Jersey, LLC	Transource New Jersey was formed in New Jersey because New Jersey requires a company pursuing business in their state to be domiciled in New Jersey. It will develop transmission projects in New Jersey.
	03.	Transource New York, LLC	Formed to provide support to Transource Energy in the state of New York.
	04.	Transource New York Land Company, Inc.	Formed to (i) develop, construct, finance, own, operate and maintain electric transmission lines, stations and related facilities (including the acquisition of real property interest related thereto) and (ii) engage in any lawful act or activity for which corporations may be organized in accordance with Section 4 of the Transportation Corporations Law of the State of New York, provided that is it not formed to engage in any act or activity requiring the consent or approval of any state official, department, board agency or other body without such consent or approval first being obtained.
	03.	Transource North Carolina, LLC	Transource North Carolina was formed in North Carolina because North Carolina requires a company pursuing business in their state to be domiciled in North Carolina. It will develop transmission projects in North Carolina.
	03.	Transource Ohio, LLC	Transource Ohio was formed in Ohio because Ohio requires a company pursuing business in their state to be domiciled in Ohio. It will develop transmission projects in Ohio.
	03.	Transource Pennsylvania, LLC	Formed to provide support to Transource Energy in the state of Pennsylvania.
	03.	Transource Projectco, LLC	f/k/a Transource Indiana is a Delaware LLC that will remain a shelf company until it is determined we need to have another Transource company formed such as a Transource Maryland or Transource Pennsylvania.
	03.	Transource Tennessee, Inc.	Transource Tennessee was formed in Tennessee because Tennessee requires a company pursuing business in their state to be domiciled in Tennessee. It will develop transmission projects in Tennessee.

			COMPANY NAME	Purpose of Company
	03.		Transource Virginia, Inc.	Transource Virginia was formed in Virginia because Virginia requires a company pursuing business in their state to be domiciled in Virginia. It will develop transmission projects in Virginia.
	03.		Transource West Virginia, LLC	Joint venture formed for the purpose of developing, constructing and owning high voltage transmission in West Virginia.
	03.		Transource Wisconsin, LLC	Entity formed to participate in certain Wisconsin competitive transmission projects. Its activity will initially be limited to submitting proposals in response to RFPs for the WI competitive projects.
	01.		AEP Utility Funding, LLC	Funds the Utility Money Pool.
	01.		American Electric Power Service Corporation	Providing accounting, administrative, information technology, engineering, financial, legal, maintenance, and other services at cost to AEP system companies.
	02.		American Electric Power Foundation	Non-profit
	01.		Appalachian Power Company	Public utility operating company engaged in the generation and purchase of electric power, and the subsequent sale, transmission and distribution of that power to 962,000 retail customers in its service territory in southwestern Virginia and southern West Virginia.
	02.		Appalachian Consumer Rate Relief Funding LLC	This entity was formed to issue West Virginia consumer rate relief bonds and use the proceeds to purchase consumer rate relief property from Appalachian Power Company.
	02.		Cedar Coal Co. (Inactive)	Inactive coal-mining subsidiary of Appalachian Power Company. The mining operations were sold in 1984.
	02.		Central Appalachian Coal Company (Inactive)	Inactive coal-mining subsidiary of Appalachian Power Company. The mining operations were sold in 1984.
	02.		Central Coal Company (Inactive)	Inactive jointly owned coal-mining subsidiary of Appalachian Power Company and Ohio Power Company. The mining assets were sold in 2004 - 2005.
	02.		Southern Appalachian Coal Company (Inactive)	An inactive coal-mining subsidiary of Appalachian Power Company. The mining operations were sold in 1984.
	01.		Franklin Real Estate Company	Acts as an agent for the purchase and sale of real and personal property for the operating companies of the AEP system.
	02.		Indiana Franklin Realty, Inc.	Acts as an agent for the purchase and sale of real and personal property for various AEP operating companies in Indiana, Illinois, Louisiana and Texas.
	01.		Indiana Michigan Power Company	Public utility operating company subsidiary engaged in the generation and purchase of electric power, and the subsequent sale, transmission and distribution of that power to 582,000 retail customers in its service territory in northern and eastern Indiana and a portion of southwestern Michigan. River Transportation Division provides barging services to affiliates and nonaffiliated companies.
	02.		Blackhawk Coal Company (Inactive)	Inactive - owned coal mines in Utah; the mines have subsequently been closed.
	02.		Price River Coal Company, Inc. (Inactive)	Inactive - The company was formerly engaged in mining coal on Utah properties owned or leased by Blackhawk Coal Company.
	01.		Kentucky Power Company	Public utility operating company subsidiary engaged in the generation and purchase of electric power, and the subsequent sale, transmission and distribution of that power to 175,000 retail customers in its service territory in eastern Kentucky.
	01.		Kingsport Power Company	Public utility operating company subsidiary engaged in the purchase of electric power, and the subsequent sale, transmission and distribution of that power to 46,000 retail customers in its service territory in northeastern Tennessee.
	01.		Ohio Power Company	A public utility operating company subsidiary engaged in the purchase of electric power, and the subsequent sale, transmission and distribution of that power to retail customers in Ohio.
	02.		Ohio Phase-In-Recovery Funding LLC	Special purpose entity formed to issue phase-in-recovery bonds on behalf of Ohio Power Company.
	02.		Ohio Valley Electric Corporation	A nonaffiliated electric utility that owns electric generating facilities and sells electricity to sponsoring companies according to the Inter-Company Power Agreement, including certain AEP operating companies located in PJM.
	03.		Indiana-Kentucky Electric Corporation	Owns and operates an electric generating facility in Indiana.
	01.		Ohio Valley Electric Corporation	A nonaffiliated electric utility that owns electric generating facilities and sells electricity to sponsoring companies according to the Inter-Company Power Agreement, including certain AEP operating companies located in PJM.
	02.		Indiana-Kentucky Electric Corporation	Owns and operates an electric generating facility in Indiana.
	01.		Oil Casualty Insurance, Ltd.	A Bermuda based insurer that provides excess liability insurance coverage to AEP. AEP opted to buy a share to gain a voting voice with the board of directors.
	01.		PowerTree Carbon Company, LLC	An initiative sponsored by 25 US utilities to plant trees in critical habitats in the lower Mississippi River Valley to capture carbon dioxide and to create environmental benefits. At inception, AEP owned a 12% investment in Power Tree.
	01.		Public Service Company of Oklahoma	Public utility operating company subsidiary engaged in the generation and purchase of electric power, and the subsequent sale, transmission and distribution of that power to approximately 527,000 retail customers in eastern and southwestern Oklahoma.

		COMPANY NAME	Purpose of Company
01.		Southwestern Electric Power Company	Public utility operating company subsidiary engaged in the generation and purchase of electric power, and the subsequent sale, transmission and distribution of that power to approximately 471,000 retail customers in northeastern Texas, northwestern Louisiana and western Arkansas.
	02.	Arkansas Coalition for Affordable and Reliable Electricity, LLC [ACARE]	Nonprofit organization. Owners of the coalition are Southwestern Electric Company and Arkansas Electric Cooperative Corporation (AECC). AECC is a part owner of the plant.
	02.	Dolet Hills Lignite Company, LLC	Holds the investment in the Dolet Hills lignite mine in Louisiana. DHLC is a contract mining operator that sells 50% of the lignite produced to SWEPCo and 50% to Cleco Corporation, a nonaffiliated company, for use in the Dolet Hills Power Station.
	02.	Mutual Energy SWEPCo, LLC	Formed in Delaware in 2001 to serve approximately 8,000 former AEP Texas North Company customers located in the Southwest Power Pool and thus excluded from Texas retail competition. The customers were transferred to SWEPCO in January 2007.
	02.	Oxbow Lignite Company, LLC	A jointly owned subsidiary of Southwestern Electric Power Company and nonaffiliated partner Cleco Power LLC formed in 2009 to own the mine reserves associated with Oxbow mine, and operate, through the mine operator (currently Dolet Hills Lignite Company, LLC) the Oxbow lignite mine in DeSoto, Red River and Natchitoches Parishes, Louisiana.
	02.	Southwest Arkansas Utilities Corporation	Formed in Arkansas in 1928 to act as an agent in certain real estate matters.
	02.	The Arklahoma Corporation	A corporation formed in Arkansas in 1947 in which Southwestern Electric Power Company owns common stock. Arklahoma owns a 165 KV transmission line between Lake Catherine, Arkansas and Boudinot Tap near Tahlequah, Oklahoma, the Lake Catherine station, and incidental other property.
01.		Wheeling Power Company	Public utility operating company subsidiary engaged in the purchase of electric power, and the subsequent sale, transmission and distribution of that power to 41,000 retail customers in the northern panhandle of West Virginia. The company purchases electric power from Ohio Power Company for distribution to its customers.

INDIANA MICHIGAN POWER COMPANY

FEBRUARY 2018 CODE OF CONDUCT COMPLIANCE REPORT

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 2017 regarding the compliance of Indiana Michigan Power Company with the Code of Conduct.