

File

93-7000-EL-FAD 4

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

RECEIVED
MAR 3 1997
DOCKETING DIVISION
Public Utilities Commission of Ohio

Central Area Power Coordinating Group : Docket No. OA97-221-000

MOTION TO INTERVENE AFTER TIME
BY THE
PUBLIC UTILITIES COMMISSION OF OHIO

Pursuant to Rule 214(a)(2) of the Federal Energy Regulatory Commission's (Commission or FERC) Rules of Practice and Procedure, 18 C.F.R. Section 385.214(a)(2), the Public Utilities Commission of Ohio (Ohio Commission) hereby moves to intervene in the above-captioned cases.

1) The Public Utilities Commission of Ohio is a "state commission" as that term is used in the Rules of Practice and Procedure of the FERC.

2) All communications related to this proceeding should be served upon:

Daniel R. Johnson
Utilities Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43266-0573
(614) 644-7642

Johnlander Jackson-Forbes
Anne L. Hammerstein
Assistant Attorneys General
Public Utilities Commission of Ohio
180 East Broad St., 7th Floor
Columbus, OH 43215
(614) 466-4396

3) Central Area Power Coordinating Group submitted a compliance filing (e.g., joint pool-wide compliance tariff and proposed amendments to pool agreements) on December 31, 1996, in accordance with the provisions of Order No. 888.

4) The Ohio Commission has a direct and important interest in this proceeding because Ohioans receive service from the Central Area Power Coordinating

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Group, and as such, is interested in all matters that may have an affect on the operations of the power pool. As the regulatory body responsible for regulating the price of electric service supplied to the residential, commercial and industrial customers in the State of Ohio, the Ohio Commission maintains a continuing interest in matters related to electric utilities and their affiliates operating in the State of Ohio. The Ohio Commission's interest in these proceedings is heightened and prompted by the Ohio Commission's ongoing electric roundtable proceedings which is currently focusing on unbundling matters that may be affected by issues and/or decisions in this docket relative to retail competition.


5) The Ohio Commission submits, as grounds for late intervention, that counsel has been extremely busy with other pressing matters. The Ohio Commission acted on this matter as quickly as the press of other business would permit. The Ohio Commission accepts the record as it stands at the time of the filing of this motion. Granting the Ohio Commission's motion for intervention will not cause a delay or prejudice any other party.

6) Because the Ohio Commission regulates the cost of electric service to all electric utility customers in the State of Ohio, the interests represented by the Ohio Commission are not adequately represented by other parties in this proceeding.

WHEREFORE, the Public Utilities Commission of Ohio has a substantial interest in this proceeding that will be directly affected by the Commission's actions herein and that cannot adequately be represented by any other party. Accordingly, the Public Utilities Commission of Ohio requests that it be allowed to intervene in this proceeding.

Respectfully submitted,

Duane W. Luckey
(Chief - Public Utilities Section)

A handwritten signature in cursive script, reading "Johnlander Jackson-Forbes".

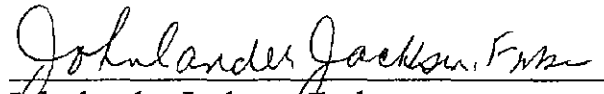
Johnlander Jackson-Forbes
Anne L. Hammerstein
Assistant Attorneys General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
(614) 466-4396
FAX: (614) 644-8764

**Attorneys for The Public Utilities
Commission of Ohio**

CERTIFICATE OF SERVICE

I hereby certify that, upon receipt of the official service list, the foregoing document will be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Columbus, Ohio this 3rd day of March 1997.

A handwritten signature in cursive script, reading "Johnlander Jackson Forbes", is written over a horizontal line.

Johnlander Jackson Forbes
Assistant Attorney General