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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Ohio Power Company) Case No. 99-1730-EL-ETP
For Approval of Electric Transition Plan)

PUCO

**MOTION OF MID-ATLANTIC POWER SUPPLY
ASSOCIATION TO INTERVENE**

Pursuant to Ohio Revised Code ("R.C.") Section 4903.22.1 and Ohio Administrative Code ("OAC") Rule 4901-1-11, Mid-Atlantic Power Supply Association ("MAPSA"), hereby moves to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant MAPSA leave to intervene because MAPSA has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect MAPSA's ability to protect its interests. Reasons which support MAPSA's Motion are addressed below.

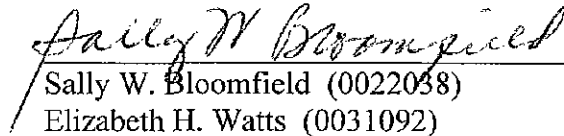
MEMORANDUM IN SUPPORT

MAPSA is a trade association of power marketers, independent power producers, and various companies who support the electric services industry within the Mid-Atlantic marketplace, each of whom seeks to develop a more competitive power industry. MAPSA has made a significant investment in the legislative, individual utility company restructuring, and commission rules' promulgation processes in Pennsylvania, New Jersey, Maryland, and Delaware. Most members are licensed to sell wholesale or retail electric energy in the competitive retail markets of some or all of the aforementioned states. MAPSA has compelling interests in the development of a robust competitive electric market in the Ohio Power Company service area in which MAPSA plans to participate. MAPSA has business interests and business

plans which are unique to it in entering and competing in the service area of Ohio Power Company. Issues relevant to MAPSA's interests will be determined in this matter and no other party to this proceeding would adequately represent MAPSA's unique interests. Therefore, it is vital to those interests that MAPSA be permitted to intervene.

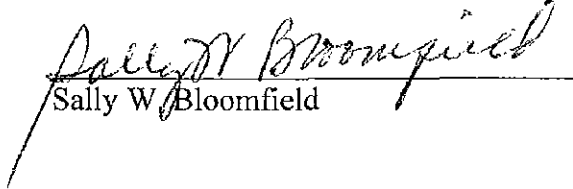
WHEREFORE Mid-Atlantic Power Supply Association moves the Commission to grant its Motion to Intervene.

Respectfully submitted on behalf of
MID-ATLANTIC POWER SUPPLY ASSOCIATION


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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion of Mid-Atlantic Power Supply Association to Intervene was served upon the parties listed on the attached Service List by regular U.S. Mail, postage prepaid, this 7th day of February, 2000.


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