

4

fill

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Ohio Power Company)
For Approval of Electric Transition Plan)

Case No. 99-1730-EL-ETP

PUCO

RECEIVED - ACCOUNTING DIV
00 FEB -7 PM 4:12

MOTION OF PP&L ENERGY PLUS CO., LLC
TO INTERVENE

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

MEMORANDUM IN SUPPORT

EnergyPlus is a wholly owned subsidiary of PP&L, Inc. and is licensed as a retail electricity supplier in the states of Pennsylvania, New Jersey, Delaware Montana, and Maine and serves a significant amount of retail electric load in Pennsylvania. As such, EnergyPlus is knowledgeable and experienced in competitive energy supply and serving retail customers in competitive markets and has been an active marketer since the inception of the Pennsylvania Customer Choice Pilot Program in 1997. EnergyPlus has compelling interests in the development of a robust competitive electric market in the Ohio Power Company service area in which EnergyPlus plans to participate. EnergyPlus 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 EnergyPlus' interests will be determined in this matter and no other party to

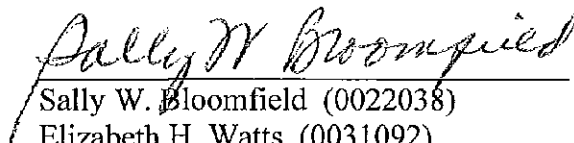
this proceeding would adequately represent EnergyPlus' unique interests. Therefore, it is vital to those interests that EnergyPlus be permitted to intervene.

Service of pleadings and all proceedings in this matter should be made upon:

1. Sally W. Bloomfield
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291; and
2. Daniel V. Gulino
Counsel for PP&L EnergyPlus Co., LLC
Two North Ninth Street
Allentown, PA 18101

WHEREFORE EnergyPlus moves the Commission to grant its Motion to Intervene.

Respectfully submitted on behalf of
PP&L EnergyPlus Co., LLC

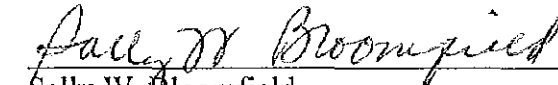

Sally W. Bloomfield (0022038)
Elizabeth H. Watts (0031092)
Amy Straker Bartemes (0062288)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
(614) 227-2368; 227-2370 Counsel:

and

Daniel V. Gulino
Counsel for PP&L EnergyPlus Co., LLC
Two North Ninth Street
Allentown, PA 18101
(610) 774-5013

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion of PP&L EnergyPlus Co., LLC 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.


Sally W. Bloomfield

SERVICE LIST
Case No. 99-1730-EL-ETP

address

Marvin I. Resnik
American Electric Power Service
1 Riverside Plaza
Columbus, OH 43215

Kimberly J. Wile, Esq.
McNees Wallace & Nurick
Fifth Third Center
21 East State St., Suite 1700
Columbus, OH 43215

Joelle Kay Ogg, Esq.
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, DC 20036-3013

Jeffrey L. Small, Esq.
Chester, Willcox & Saxbe
17 South High Street
Suite 900
Columbus, OH 43215

Sheldon A. Taft
Vorys, Sater, Seymour & Pease
52 East Gay Street
P. O. Box 1008
Columbus, OH 43216-1008

David C. Rinebolt
Ohio Partners for Affordable Energy
P. O. Box 1793
Findlay, OH 45839-1793

Robert P. Mone
Thompson, Hine and Flory
10 West Broad Street
Suite 700
Columbus, OH 43215

Scott A. Campbell
Thompson Hine & Flory
10 West Broad Street, 7th Floor
Columbus, OH 43215

Gregory K. Lawrence
Sutherland, Asbill & Brennan LLP
1275 Pennsylvania Ave. NW
Washington, DC 20004-2415

Paul F. Forshay
Sutherland, Asbill & Brennan LLP
1275 Pennsylvania Ave. NW
Washington, DC 20004-2415

James J. Mayer, Esq.
Taft, Stettinius & Hollister LLP
1800 Firststar Tower
425 Walnut Street
Cincinnati, OH 45202

M. Howard Petricoff
Vorys, Sater, Seymour & Pease
52 East Gay Street
P. O. Box 1008
Columbus, OH 43216-1008

Coleen L. Mooney
Attorney-at-Law
Office of Consumers Counsel
77 S. High St., 15th Fl.
Columbus, OH 43266-0550

Michael L. Kurtz
Boehm, Kurtz & Lowry
2110 Society Bank Center
36 East Seventh Street
Cincinnati, OH 45202