BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO: -7 FK 4: 18 Application of) PHOO

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

MOTION TO INTERVENE OF COLUMBIA ENERGY SERVICES CORPORATION AND COLUMBIA ENERGY POWER MARKETING CORPORATION

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Pursuant to Ohio Revised Code ("R.C.") Section 4903.22.1 and Ohio Administrative Code ("OAC") Rule 4901-1-11, Columbia Energy Services Corporation and Columbia Energy Power Marketing Corporation (collectively referred to as the "Columbia Energy companies"), hereby move to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the Columbia Energy companies leave to intervene because the Columbia Energy companies have a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect the ability of the Columbia Energy companies to protect its interests. Reasons which support this Motion are addressed below.

MEMORANDUM IN SUPPORT

Columbia Energy Services Corporation is a subsidiary of the Columbia Energy Group, one of the nation's largest, fully integrated, energy systems. Columbia Energy Power Marketing Corporation is a subsidiary of Columbia Energy Services Corporation. The customer base of the Columbia Energy companies represents all sectors of business and industry (utilities and large industrials to small commercial business and residential). The Columbia Energy companies are uniquely positioned through all its energy products and services to provide the most comprehensive and objective response to its customer's needs. The Columbia Energy companies have a compelling interest in the development of a robust competitive electric market in the Ohio Power Company service area in which the Columbia Energy companies plan to participate. The

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Columbia Energy companies have 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 the interests of the Columbia Energy companies will be determined in this matter and no other party to this proceeding would adequately represent the unique interests of the Columbia Energy companies. Therefore, it is vital to those interests that the Columbia Energy companies be permitted to intervene.

WHEREFORE the Columbia Energy companies move the Commission to grant its Motion to Intervene.

> Respectfully submitted on behalf of COLUMBIA ENERGY SERVICES CORPORATION and COLUMBIA ENERGY POWER MARKETING CORPORATION

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion to Intervene of Columbia Energy Services Corporation and Columbia Energy Power Marketing Corporation was served upon the parties listed on the attached Service List by regular U.S. Mail, postage prepaid, this 1^{th} day of February, 2000.

Jally W. Bloomfield

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

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