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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

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

Case No. 99-1730-EL-ETP

MOTION TO INTERVENE OF STRATEGIC ENERGY L.L.C.

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

MEMORANDUM IN SUPPORT

SEL is a power marketer licensed by the Federal Energy Regulatory Commission. It is also licensed to sell power on a retail basis in Pennsylvania, New York, Rhode Island, New Jersey, Delaware and Massachusetts. SEL anticipates becoming a certified supplier in Ohio to provide competitive retail electric services. SEL is uniquely positioned through all its energy products and services to provide the most comprehensive and objective response to its customer's needs. SEL has a compelling interest in the development of a robust competitive electric market in the Ohio Power Company service area in which SEL plans to participate. SEL 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 SEL's interests will be determined in this matter and

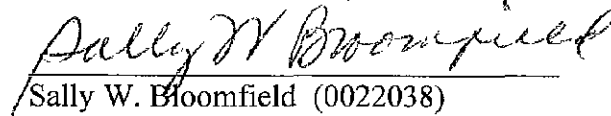
no other party to this proceeding would adequately represent SEL's unique interests. Therefore, it is vital to those interests that SEL be permitted to intervene.

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

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2. Wanda M. Schiller
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WHEREFORE Strategic Energy L.L.C. moves the Commission to grant its Motion to Intervene.

Respectfully submitted on behalf of
STRATEGIC ENERGY, L.L.C.




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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion to Intervene of Strategic Energy L.L.C. 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

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Case No. 99-1730-EL-ETP

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