FILE

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Via Overnight Mail

August 1, 2008

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case Nos. 08-917-EL-SSO and 08-918-EL-SSO

Dear Sir/Madam:

Please find enclosed an original and ten (10) copies of the OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

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MLKkew Encl.

Cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by ordinary mail, unless otherwise noted, this 1st day of August, 2008 to the following:

COLUMBUS SOUTHERN POWER COMPANY SELWYN J. R. DIAS SUITE 800 88 E. BROAD STREET COLUMBUS OH 43215 RESNIK, MARVIN AMERICAN ELECTRIC POWER SERV CORPORATION 1 RIVERSIDE PLAZA, 29TH FLOOR COLUMBUS OH 43215

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Columbus

Case No. 08-917-EL-SSO

Southern Power Company For Approval Of Its

Electric Security Plan, And Amendment To Its Corporate Separation Plan; And The Sale Or

Transfer Of Certain Generation Assets

:

In The Matter Of The Application Of Columbus

Southern Power Company For Approval Of Its

Electric Security Plan, And An Amendment To Its

Corporate Separation Plan

Case No. 08-918-EL-SSO

MOTION TO INTERVENTION OF THE THE OHIO ENERGY GROUP

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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COUNSEL FOR THE OHIO ENERGY GROUP

August 1, 2008

BEFORE THE PUBLIC UTILITY COMMISSION OF Ohio

In The Matter Of The Application Of Columbus Southern Power Company For Approval Of Its

Electric Security Plan, And Amendment To Its Corporate Separation Plan; And The Sale Or

Transfer Of Certain Generation Assets

:

In The Matter Of The Application Of Columbus Southern Power Company For Approval Of Its Electric Security Plan, And An Amendment To Its

Corporate Separation Plan

Case No. 08-918-EL-SSO

Case No. 08-917-EL-SSO

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Ford Motor Company, GE Aviation, Griffin Wheel, ArcelorMittal, Griffin Wheel, The Procter & Gamble Distribution Company, PPG Industries, Inc., Republic Engineered Products, Inc., Wheeling-Pittsburgh Steel Corporation and Worthington Industries. These companies purchase large amounts of electric power services from Columbus Southern Power. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.