

FILE

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September 4, 2008

Via Hand Delivery
Ms. Betty McCauley
Docketing Division Chief
180 E. Broad St. 13th Floor
Columbus, OH 43215

RECEIVED-DOCKETING DIV
2008 SEP -4 PM 3:29
PUCO

RE: DOCKET NO(S) 08-917-EL-SSO, 08-918-EL-SSO; IN THE MATTER OF THE APPLICATION OF COLUMBUS SOUTHERN POWER COMPANY FOR APPROVAL OF ITS ELECTRIC SECURITY PLAN; AN AMENDMENT TO ITS CORPORATE SEPARATION PLAN; AND THE SALE OR TRANSFER OF CERTAIN GENERATING ASSETS. IN THE MATTER OF THE APPLICATION OF OHIO POWER COMPANY FOR APPROVAL OF ITS ELECTRIC SECURITY PLAN; AND AN AMENDMENT TO ITS CORPORATE SEPARATION PLAN.

Dear Ms. McCauley:

Enclosed please find an original and twenty-one (21) copies of the "Motion to Intervene of ConsumerPowerline", the "Verified Motion of Scott H. DeBroff for Pro Hac Vice Admission" and the "Verified Motion of Stephen J. Romeo for Pro Hac Vice Admission" for this docket.

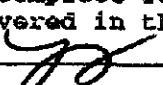
Please enter this into the record and time-stamp the additional two (2) copies for our files. If you have any questions regarding this filing, please do not hesitate to call us at (614) 221-1311.

Sincerely,



Benjamin Edwards

Enclosures

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE
APPLICATION OF COLUMBUS SOUTHERN
POWER COMPANY FOR APPROVAL OF
ITS ELECTRIC SECURITY PLAN; AN
AMENDMENT TO ITS CORPORATE
SEPARATION PLAN; AND THE SALE OR
TRANSFER OF CERTAIN GENERATING
ASSETS.**

CASE NO. 08-917-EL-SSO

**IN THE MATTER OF THE APPLICATION
OF OHIO 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 INTERVENE OF
CONSUMERPOWERLINE**

**SCOTT H. DEBROFF, ESQUIRE
STEPHEN J. ROMEO, ESQUIRE
ALICIA R. PETERSEN, J.D.**
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DATED: SEPTEMBER 4, 2008

COUNSEL FOR CONSUMERPOWERLINE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE
APPLICATION OF COLUMBUS SOUTHERN
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AND NOW COMES, ConsumerPowerline ("CPLN"), by and through its counsel, **Scott H. DeBroff, Esquire** and **Stephen J. Romeo, Esquire** of Smigel, Anderson & Sacks LLP, and hereby petitions for leave to intervene in the above-captioned action pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code ("OAC"). ConsumerPowerline respectfully submits that all factors for party status, as set forth in, support ConsumerPowerline's motion in the above-captioned proceeding. In support of its motion for party status in this proceeding, CPLN avers the following:

1. **ConsumerPowerline ("CPLN")** is one of the nation's leading demand side management providers, with significant experience providing demand response, energy efficiency, and

distributed generation services in New York, New England, California, the Mid-Atlantic, and increasingly in other regions. CPLN maintains direct alignment with our clients' incentives – we earn revenues only when we achieve energy savings for our clients: large and small end-users of all types.

2. As a full service strategic energy asset management firm and one of the largest providers of demand response solutions in the United States, with more than 1200 MW's under management, CPLN currently operates in the nation's largest energy markets including Illinois, New York, California, New England, and many others. ConsumerPowerline's clients include Fortune 1000 companies and some of the nation's largest commercial, residential, retail and institutional facilities. ConsumerPowerline has found particular success partnering with hotels, hospitals, large co-op residential apartment complexes, financial institutions, and REIT's. CPLN's clients include dozens of substantial users of energy nationwide.

3. CPLN provides its clients with Demand Management, Curtailment Services and Strategic Energy Asset Management Services. These services include assumption of market risk, representation in all ISO/State programs, interval metering, web-based access to consumption of data, engineering qualification of curtailable load, financing to improve demand response capabilities, frequent optimization of biddable loads, comprehensive energy audits and analysis, identification of tax saving opportunities, design and project management of ECMs & PDRs, generator uploading, load switching and controls, retro-commissioning to improve energy efficiency, controls development, upgrades and optimization, incentive optimization and reporting, project financing, performance-based contracting and stream management and

negotiations. ConsumerPowerline also provides retail customers with access to PJM's demand response programs. As a result of these services, CPLN is able to provide clients with cost saving mechanisms to reduce energy usage.

4. CPLN's clients include more than 75 million square feet of commercial real estate and more than 110,000 residential units.

5. ConsumerPowerline wishes to be granted **"Party"** status in this docket and ask that it be granted notice of all activities related to these proceedings. Further, ConsumerPowerline requests that it be placed on the Official Service List in this proceeding, and that it be served with all pleadings, notices and orders.

6. ConsumerPowerline looks forward to participating in these proceeding as it moves forward before the Commission.

7. ConsumerPowerline's attorneys, and to whom all correspondence and pleadings in this docket should be directed to are:

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WHEREFORE, ConsumerPowerline respectfully requests that the Public Utilities Commission of Ohio enter an order granting it party status in the above-captioned proceedings, including the right to exercise all statutory rights provided to parties under Ohio law.

Respectfully submitted,

By: //s//

SCOTT H. DEBROFF, ESQUIRE
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COUNSEL FOR CONSUMERPOWERLINE

DATED: SEPTEMBER 4, 2008

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **"MOTION TO INTERVENE OF CONSUMERPOWERLINE"** upon the Service List by email, by first class mail service as necessary:

Dated: September 4, 2008

By: //s//

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