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**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of	)	
Columbus Southern Power Company and	)	
the Ohio Power Company for Authority to	)	Case Nos. 08-0917-EL-SSO
Establish a Standard Service Offer Pursuant	)	08-0918-EL-SSO
to R.C. § 4928.143 in the Form of an	)	
Electric Security Plan	)	

**JOINT MOTION FOR LEAVE TO INTERVENE OF  
THE OHIO ASSOCIATION OF SCHOOL BUSINESS OFFICIALS,  
THE OHIO SCHOOL BOARDS ASSOCIATION  
AND THE BUCKEYE ASSOCIATION OF SCHOOL ADMINISTRATORS**

Now come the Ohio Association of School Business Officials ("OASBO"), the Ohio School Boards Association ("OSBA") and the Buckeye Association of School Administrators ("BASA") and pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, jointly move for intervention in the above-styled proceedings as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, OASBO, OSBA and BASA respectfully request that the Commission grant their joint motion for leave to intervene and that they be made a full party of record.

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Respectfully submitted,



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**MEMORANDUM IN SUPPORT OF THE MOTION TO INTERVENE OF**  
**OHIO ASSOCIATION OF SCHOOL BUSINESS OFFICIALS,**  
**THE OHIO SCHOOL BOARDS ASSOCIATION**  
**AND THE BUCKEYE ASSOCIATION OF SCHOOL ADMINISTRATORS**

Section 4903.221, Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code establish the standard for intervention in the above-styled proceeding as a full party of record.

Rule 4901-1-11 of the Ohio Administrative Code states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

\* \* \*

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

In addition to establishment of a direct interest, the factors that the Public Utilities Commission of Ohio (the "Commission") considers in implementing the above rule are the nature of the intervenor's interest, the extent that interest is represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. (See also R.C. 4903.221(B) upon which the above rule is authorized). A review of these factors in light of following facts supports granting OASBO, OSBA and BASA's intervention.

The Ohio Association of School Business Officials ("OASBO"), the Ohio School Boards Association ("OSBA") and the Buckeye Association of School Administrators ("BASA") are non-profit groups of public school administrators who seek to share best practices and information concerning the operation of educational institutions. As part of their activities OASBO, OSBA and BASA, since the inception of open access to generation, have run a program called "SchoolPool". SchoolPool seeks to assist not-for-profit schools and school systems to

save money on electricity by determining (given current rates) if any particular school building can purchase energy for less than the prescribed tariff. Since many school buildings are not fully utilized during the summer their peak usage is not coincidental with that of electric distribution utilities. This somewhat off-peak seasonal pattern of electricity use by certain school buildings often results in a potential savings if the power is bought on the open market. SchoolPool, in addition to assisting school administrators identify likely candidates for generation purchases, also shops the market for energy providers in order to assist the schools in shopping for energy. Today more than 475 school accounts participate in the SchoolPool program across Ohio.

The Application filed by AEP in the matter at bar seeks to establish a Standard Service Offer in the form of an Electric Security Plan pursuant to R.C. § 4928.143 to be effective on January 1, 2009. The Electric Security Plan requested by AEP has a significant deferral which, if implemented as requested, would cause schools participating in the School Pool program to have to pay for both the energy they use to the Competitive Retail Electric Service Provider and then via the deferral fee (which is not bypassable) for energy used by former standard service customers.

This unintended, anti-competitive and anti-aggregation outcome can easily be avoided if the deferral AEP requests is booked against the distribution fee instead of energy. Such an outcome should have no impact on the cash flow to AEP or the money it will earn in carrying charges for the deferral.

WHEREFORE, in light of the OASBO, OSBA and BASA's direct, real, and substantial interest in the issues in the above-styled proceeding, OASBO, OSBA and BASA respectfully request that the Commission grant their joint motion for leave to intervene and that they be made a full party of record.

Respectfully Submitted,



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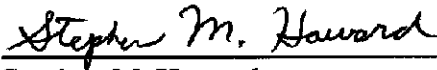
Association of School Business Officials,

Ohio School Boards Association, and

Buckeye Association of School Administrators

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 4th day of September, 2008 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.

  
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