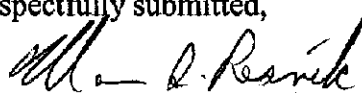


MEMORANDUM IN SUPPORT

AEP Ohio is a utility directly concerned with the topic of this Commission's investigation into the development of the significantly excessive earnings test created by S.B. 221. AEP Ohio's interest cannot be adequately represented by any other party. AEP Ohio is participating in the proceeding by providing information and knowledge which will assist the Commission in determining the methodology of determining whether an electric utility had significantly excessive earnings.

AEP Ohio's intervention will not unduly delay, or hinder the proceeding nor prejudice any party in this proceeding. AEP Ohio has a real and substantial interest and should be granted intervention in this proceeding.

Respectfully submitted,



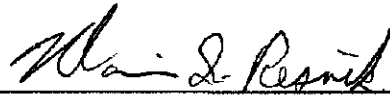
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CERTIFICATE OF SERVICE

I certify that a copy of the above Motion to Intervene was served upon those parties listed below via first class U.S. Mail, postage paid, on this 16th day of October 2009.



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