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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbus Southern Power Company) Case No. 09-1089-EL-POR
For Approval of its Program Portfolio)
Plan and Request for Expedited)
Consideration)

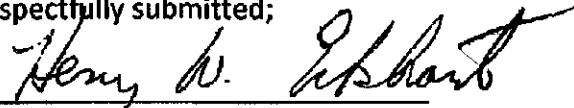
In the Matter of the Application of)
Ohio Power Company for Approval) Case No. 09-1090-ELPOR
Of its Program Portfolio and)
Request for Expedited Consideration)

MOTION TO INTERVENE
BY
THE SIERRA CLUB OF OHIO

The Sierra Club of Ohio ("Sierra club") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in both of the above styled cases pursuant to Sec. 4903.221 Revised Code of Ohio, and Rule 4901-1-11, of the Ohio Administrative Code, with full powers and rights granted by the commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties. The Sierra Club provides the following Memorandum In Support of the foregoing Motion.

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Respectfully submitted;


Henry W. Eckhart (Counsel of Record)
Attorney for The Sierra Club of Ohio
50 West Broad Street #2117
Columbus Ohio 43215
Phone: (614) 461-0984
Fax: (614) 221-7401
E-mail: henryeckhart@aol.com

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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene, The Sierra Club states that it is the world's oldest and largest grassroots environmental organization. It has 1.4 million members and supporters in 65 Chapters and over 400 local groups nationwide.

The Sierra Club statement of purpose is "To explore, enjoy and protect the wild places of the Earth, to practice and promote the responsible use of the Earth's ecosystem and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives." The Sierra Club had been involved in promotion of responsible energy policy almost since its first year.

The Ohio Chapter has over 17,000 members throughout the state. Global Warming is the Sierra Club's highest priority issue. The Ohio Chapter has been actively promoting energy efficiency as the lowest cost most environmentally accepted resource since 1984.

The Ohio Chapter has been involve in approximately 25 separate cases before the Commission during the 1990's and 2000's involving all of the 7 major IOU electric utilities in Ohio. The Ohio Chapter was a key proponent of the energy efficiency measures in Sub. S. B. 221.

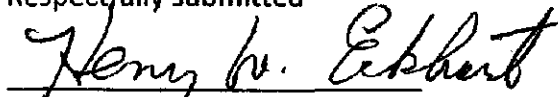
Many of The Sierra Club's Ohio members are served by the FirstEnergy companies that are parties to this case. The Sierra Club has a real and substantial interest as these proceedings may directly or indirectly impact the environment of the State of Ohio, and even other areas of the United States.

Intervention of The Sierra Club will not unduly prolong or delay the proceedings.

The particular interest regarding the environmental issues will not be fully represented by other existing parties.

WHEREFORE, the Sierra Club of Ohio respectfully requests that its Motion to Intervene be granted in full as aforesaid.

Respectfully submitted



Henry W. Eckhart (0020202)

Attorney for The Sierra Club of Ohio

CERTIFICATE OF SERVICE

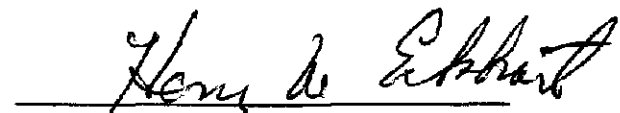
The undersigned hereby certifies that he is serving a copy of the foregoing Motion and Memorandum on the following counsel, by ordinary mail, postage prepaid, and/or by electronic mail, this 4th day of December, 2009.

Steven T. Nourse
American Electric Power Company
1 Riverside Plaza
Columbus OH 43215

Clinton A. Vince
Sonnenschein Nath & Rosenthal
1301 K Street Suite 600 East Tower
Washington DC 20005

Vicki Leach-Payne
McNees Wallace & Nurick
21 East State Street, 17th floor
Columbus OH 43215

David C. Rinebolt
Ohio Partners For Affordable Energy
231 West Lima St PO Box 1793
Findlay OH 45839-1793



Henry W. Eckhart (0020202)

Attorney for The Sierra Club of Ohio