

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term Forecast)
Report of Ohio Power Company and) Case No. 10-501-EL-FOR
Related Matters.)

In the Matter of the Long-Term Forecast)
Report of Columbus Southern Power) Case No. 10-502-EL-FOR
Company and Related Matters.)

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF INDUSTRIAL ENERGY USERS-OHIO**

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January 28, 2011

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(C33166:)

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MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On April 15, 2010, Ohio Power Company ("OPCo") and Columbus Southern Power Company ("CSP") (collectively "AEP-Ohio") filed its 2010 long-term forecast report ("LTFR"). On December 20, 2010, AEP-Ohio filed a supplement to its LTFR to offer information concerning AEP-Ohio's intent to enter into a capital leasing arrangement for a 49.9 megawatt ("MW") solar facility.

On January 12, 2011, the Commission Staff filed a motion requesting that a hearing be held in these proceedings. The Commission Staff asserted that the addition of a generating facility constitutes a substantial change and that; therefore, a hearing to consider AEP-Ohio's LTFR is appropriate.

On January 26, 2011, an Entry was issued finding the Commission Staff's request for a hearing to be reasonable and scheduling an evidentiary hearing to be held on March 9, 2011.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceedings. The interests of IEU-Ohio will not be adequately represented by other parties to the proceedings and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,



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MEMORANDUM IN SUPPORT


In support of its Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, and will continue to work, to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

Some of IEU-Ohio's member companies are served by OPCo and CSP and may be affected by the matters addressed in AEP-Ohio's LTFR. IEU-Ohio has a real and substantial interest inasmuch as these proceedings may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in these proceedings is the result of the effect that these proceedings shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio, including the areas presently served by OPCo and

CSP. Thus, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, the disposition of which may impair or impede its ability to protect that interest.

Based on the foregoing reasons, IEU-Ohio requests that the Commission grant its intervention with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,

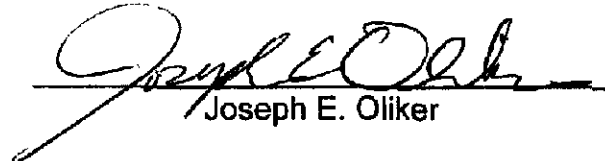


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was served upon the following parties of record this 28th day of January 2011, via electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.



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**ON BEHALF OF THE STAFF OF THE PUBLIC
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