

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus)	
Southern Power Company and Ohio Power)	Case No. 11-346-EL-SSO
Company for Authority to Establish a Standard)	Case No. 11-348-EL-SSO
Service Offer Pursuant to §4928.143, Ohio Rev.)	
Code, in the Form of an Electric Security Plan.)	

In the Matter of the Application of Columbus)	
Southern Power Company and Ohio Power)	Case No. 11-349-EL-AAM
Company for Approval of Certain Accounting)	Case No. 11-350-EL-AAM
Authority.)	

**MOTION TO INTERVENE
OF
PAULDING WIND FARM II LLC**

Paulding Wind Farm II LLC ("Paulding II") moves the Public Utilities Commission of Ohio (the "Commission"), pursuant to Ohio Revised Code ("O.R.C.") Section 4903.221 and Ohio Administrative Code ("O.A.C.") Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, Paulding II submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without the participation of Paulding II may impair or impede its ability to protect that interest, and that its participation in these proceedings will contribute to a just result. Paulding II further submits that no existing party represents its interest in these proceedings and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

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MEMORANDUM IN SUPPORT

On January 27, 2011, Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio") filed an Application to establish a standard service offer ("SSO") in the form of an electric security plan ("ESP"). Also on January 27, 2011, AEP Ohio filed an Application for approval of certain accounting authority. Paulding II has a real and substantial interest in the above-captioned proceedings, will be affected by the Commission's determination in these matters and should be permitted to intervene.

Paulding II is a Delaware limited liability company, and a subsidiary of Horizon Wind Energy LLC ("Horizon"), which is developing a wind farm in Paulding County, Ohio. Horizon is a Delaware limited liability company that develops, owns, and operates, through wholly-owned or partially owned subsidiaries, wind-powered electric generation facilities throughout North America. In November 2010, Paulding II and AEP Ohio signed a twenty (20)-year power purchases agreement ("PPA") for all of the energy produced by the ninety-nine (99) megawatt wind farm under construction by Paulding II. The agreement is included in the above-captioned proceedings and is subject to Commission approval. Paulding II is seeking intervention in this case to support its interest in the PPA.

Consistent with the requirements of O.R.C. 4903.221 and O.A.C Rule 4901-1-11, Paulding II is a real party in interest in this proceeding. Paulding II submits that its interest is not represented by existing parties and thus its interests are not now represented. Paulding II's participation will not unduly delay this proceeding or prejudice any existing party. In the interest of administrative economy in this proceeding, Paulding II requests that the Commission permit others who may wish to join with Paulding II to intervene. By granting Paulding II's motion to

intervene, the Commission will permit Paulding II to contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding.

WHEREFORE, Paulding II respectfully requests that its motion to intervene in the above-captioned proceeding be granted and that the Commission permit others to join Paulding II's motion to intervene at a later date.

Respectfully submitted on behalf of
Paulding Wind Farm II LLC,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 14th day of February 2011 *via* regular U.S. mail.



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