

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

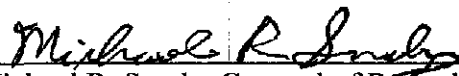
In the Matter of the Application of Columbus ) Case No. 11-349-EL-AAM  
Southern Power Company and Ohio Power ) Case No. 11-350-EL-AAM  
Company for Approval of Certain Accounting )  
Authority. )

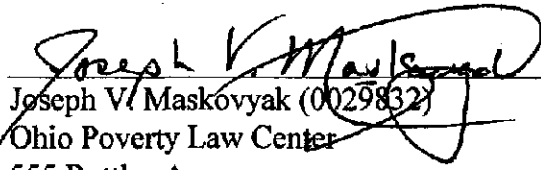
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MOTION TO INTERVENE OF  
APPALACHIAN PEACE AND JUSTICE NETWORK

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The Appalachian Peace and Justice Network ("APJN") hereby respectfully moves for leave to intervene in the above-captioned matters pursuant to R.C. 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted, by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations, to intervening parties. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

  
Michael R. Smalz, Counsel of Record (0041897)  
Ohio Poverty Law Center  
555 Butts Avenue  
Columbus, OH 43215  
Telephone: 614/221-7625  
Email: msmalz@ohiopovertylaw.org

  
Joseph V. Maskovyak (0029832)  
Ohio Poverty Law Center  
555 Buttrick Avenue  
Columbus, OH 43215  
Telephone: 614/221-7625  
Email: jmaskovyak@ohiopoveritylaw.org

**On Behalf of the Appalachian Peace and Justice  
Network**

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**BEFORE  
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**MEMORANDUM IN SUPPORT OF THE MOTION TO INTERVENE OF  
THE APPALACHIAN PEACE AND JUSTICE NETWORK**

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The Appalachian Peace and Justice Network ("APJN") should be permitted to intervene in these matters pursuant to Section 4903.221, Revised Code, and the Commission's Rules and Regulations, specifically Section 4901-1-11, Ohio Administrative Code. As required by those provisions, these intervenors are real parties in interest herein, whose interests are not now represented, who can make a contribution to the proceeding, and who will not unduly delay the proceeding nor prejudice any existing party.

APJN is a nonprofit organization that empowers and challenges groups and individuals to work for peace and social justice. It has approximately 200 members in southeastern (Appalachian) Ohio; the majority of its members are low-income and many of its members are customers or consumers of electric service by Columbus Southern Power and Ohio Power. APJN engages in a wide range of educational and advocacy efforts to promote peace, social justice, and consumer

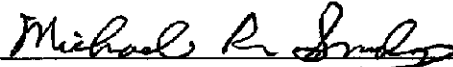
protections for low-income residents of Appalachian Ohio. It has one paid staff person/organizer and its principal office is located in Athens, Ohio.

APJN has a real and substantial interest in this proceeding by virtue of the direct impact on its members and other low-income rural residential consumers who would be adversely affected by higher rates for residential electric service by Columbus Southern Power (CSP) and Ohio Power (OP). Because APJN's low-income members have a higher energy burden (ratio of energy costs to income) than more affluent residential customers, they suffer a greater economic toll when rates increase.

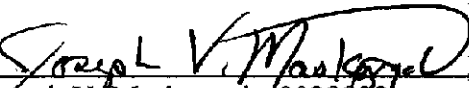
Further, APJN previously intervened in and actively participated in the AEP 2009 SEET case, PUCO Case No. 10-1261-EL-UNC, and counsel for intervenors previously represented APJN's now-defunct allied organization, the Appalachian People's Action Coalition (APAC), in the original AEP ESP case, PUCO Case Nos. 08-917-EL-SS0 and 08-918-EL-SS0.

APJN's participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the full development and equitable resolution of the issues raised in these proceedings. Furthermore, other parties to the proceedings will not adequately represent APJN's interests because of the unique low-income and rural perspective that APJN and its counsel bring to utility matters. Therefore, APJN is entitled to intervene in these proceedings with the full powers and rights granted, by the Commission specifically, by statute, and by the provisions of the Commission's Codes of Rules and Regulations, to intervening parties.

Respectfully submitted,



Michael R. Smalz, Counsel of Record (0041897)  
Ohio Poverty Law Center  
555 Buttrick Avenue  
Columbus, OH 43215  
Telephone: 614/221-7625  
Email: msmalz@ohiopoveritylaw.org

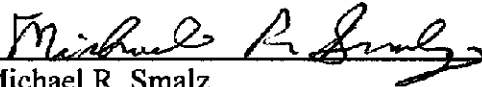


Joseph V. Maskovyak (0029832)  
Ohio Poverty Law Center  
555 Buttrick Avenue  
Columbus, OH 43215  
Telephone: 614/221-7625  
Email: jmaskovyak@ohiopoveritylaw.org

**On Behalf of the Appalachian Peace and Justice  
Network**

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene and Memorandum in Support were served by regular first class U.S. Mail, postage prepaid, upon the parties of record identified below on this 2nd day of February, 2011.



Michael R. Smalz  
Counsel for APJN

Steven T. Nourse  
Matthew J. Sattenwhite  
Anne M. Vogel  
Julie M. Rutter  
American Electric Power Service Corporation  
One Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
stnourse@aep.com  
mjsatterwhite@aep.com

Samuel Randazzo  
Joseph E. Oilker  
Frank P. Darr  
McNees Wallace & Nurick LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215  
sam@mwncmh.com  
joliker@mwncmh.com  
fdarr@mwncmh.com

Daniel R. Conway  
Porter Wright Morris & Arthur  
Huntington Center  
41 South High Street  
Columbus, OH 43215  
dconway@porterwright.com

Richard L. Sites  
General Counsel & Senior Director of Health Policy  
Ohio Hospital Association  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215-3620  
ricks@ohanet.org

Terry L. Etter  
Michael E. Idzkowski  
Maureen E. Grady  
Office of Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215  
etter@occ.state.oh.us  
idzkowski@occ.state.oh.us  
grady@occ.state.oh.us

Amy B. Spiller  
Deputy General Counsel  
Dorothy K. Corbett  
Assistant General Counsel  
Duke Energy Retail Sales LLC  
139 East Fourth Street, 1303-Main  
Cincinnati, OH 45202  
amy.spiller@duke-energy.com  
Dorothy.corbett@duke-energy.com

David F. Boehm  
Michael L. Kurtz  
Boehm, Burtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
dboehm@bkllawfirm.com  
mkurtz@bkllawfirm.com

Thomas J. O'Brien  
Bricker & Eckler, LLP  
100 South Third Street  
Columbus, OH 43215-4291  
tobrien@bricker.com

Colleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
Findlay, OH 45840  
cmooney2@columbus.rr.com

John W. Bentine  
Mark S. Yurick  
Chester Willcox & Saxbe, LLP  
65 East State Street, Suite 1000  
Columbus, OH 43215  
jbentine@cwslaw.com  
myurick@cwslaw.com

Terrance O'Donnell  
Christopher Montgomery  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215  
[Todonnell@bricker.com](mailto:Todonnell@bricker.com)  
[cmontgomery@bricker.com](mailto:cmontgomery@bricker.com)

Mark A. Hayden  
First Energy Service Company  
76 South Main Street  
Akron, OH 44308  
[hayden@firstenergycorp.com](mailto:hayden@firstenergycorp.com)