

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C. : Docket No. ER12-513-000

**MOTION TO INTERVENE AFTER TIME
SUBMITTED ON BEHALF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

The Public Utilities Commission of Ohio (PUCO) respectfully moves, pursuant to 18 C.F.R. Section 385.214, to intervene as a party in this proceeding after the December 22, 2011 date established in the Notice of Filing in this case. The late intervention occurs because the recent announcement of the planned retirement of 14 coal-fired units at six plants by FirstEnergy Solutions has contributed to the formation of a new separate ATSI sub-region (or local delivery area [LDA]) within the PJM footprint for purposes of the 2015/2016 Reliability Pricing Model (RPM) Base Residual Auction (BRA). The planned retirement of approximately 2,200 MW of generation located in the ATSI zone and the formation of a new separate LDA could have a dramatic impact on electric prices for the State of Ohio's consumers located in the ATSI region, which necessitates the Ohio's Commission's intervention in this proceeding.

1. All further communications in these dockets should be addressed to:

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2. The Public Utilities Commission of Ohio is the state regulatory agency charged in Ohio with economic and other regulatory powers over electric utilities in Ohio all of whom are members of PJM. Ohio Revised Code Title 49. The Public Utilities Commission of Ohio is, therefore, a state commission as defined in the Federal Power Act and in the Commission's Rules of Practice and Procedure. 18 C.F.R. § 1.101(k) (2012).
3. The issues in this case may have a significant impact on the ability of the Public Utilities Commission of Ohio's ability to carryout its statutory obligations regarding the electricity markets in the State of Ohio. Therefore, the PUCO respectfully requests intervention herein.
4. The PUCO is willing to take the record as it is and no party could be prejudiced by the grant of intervention at this early date before any settlement discussions have been initiated.

Respectfully submitted,

/s/ Thomas W. McNamee

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Attorney for the

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served in accordance with 18 C.F.R. Sec. 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Thomas W. McNamee

Thomas W. McNamee

Assistant Attorney General

Dated at Columbus, Ohio this February 6, 2012

Submission ID 340991

Submission Description Motion to Intervene Out-of-Time of Public Utilities Commission of Ohio under ER12-513-000.

Submission Date 2/6/2012 1:26:50 PM

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Current Status Pending

Dockets	Docket	Description
	ER12-513-000	PJM Interconnection, L.L.C. submits tariff filing per 35.13(a)(2) (iii): Revisions to PJM Tariff Attachment DD re RPM Triennial Review & RPM performance submitted on 12/1/2011 4:36:31 PM

Files	Security Level	Filename
	Public	LateInterven020612.pdf

Filing Party/Contacts	Filing Party	Signer (Representative)	Other Contacts (Principal)
	Public Utilities Commission of Ohio	thomas.mcnamee@puc.state.oh.us	daniel.shields@puc.state.oh.us

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in

Case No(s). 93-7000-EL-FAD

Summary: Motion to Intervene After Time submitted to the Federal Energy Regulatory Commission by Thomas McNamee on February 6, 2012, to be filed on behalf of the Public Utilities Commission of Ohio in FERC Docket No. ER12-513, In re PJM Interconnection, LLC. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio