BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter Of The Application of Columbus Southern Power Company For Approval Of A Mechanism To Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144.)))	Case No. 11-4920-EL-RDR
In The Matter Of The Application of Ohio Power Company For Approval Of A Mechanism To Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144.		Case No. 11-4921-EL-RDR

MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the OMA Energy Group ("OMAEG") hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMAEG has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede the OMAEG's ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay this proceeding and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMAEG's interests will not be adequately represented by other parties to this proceeding. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted on behalf of THE OMA ENERGY GROUP

Matthew W. Warnock, Counsel of Record

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MEMORANDUM IN SUPPORT

On September 1, 2011, Ohio Power Company and Columbus Southern Power Company (collectively, "AEP-Ohio"), filed an application for approval of recovering deferred fuel costs through a phase-in recovery rider, which will increase rates for OMAEG members. The members of OMAEG will be impacted by the Commission's decision relating to whether AEP-Ohio will be permitted to recover these fuel costs, and the OMAEG should be permitted to intervene in the above-captioned proceeding.

The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from AEP-Ohio, and will be affected by the Commission's

determination in this matter. Accordingly, the OMAEG should be permitted to intervene

in the above-captioned proceeding.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B),

the OMAEG submits that: it is a real party in interest herein; its interest is not now

represented, or adequately addressed, by existing parties; it will contribute to the just

and expeditious resolution of the issues and concerns set forth in this proceeding; and

its participation in this proceeding will not cause undue delay or unjustly prejudice any

existing party. The OMAEG's participation will enhance the effectiveness of the above

proceeding, and ensure that the proceeding is fair to its membership.

Accordingly, the OMAEG respectfully requests the Commission grant its Motion

to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of

THE OMA ENERGY GROUP

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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 <u>2nd</u> day of April 2012 *via* electronic transmission or first class mail.

Matthew W. Warnock

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Summary: Motion Motion to Intervene of the OMA Energy Group electronically filed by Ms. Andrea P Govan on behalf of OMA Energy Group and Mr. Matthew W Warnock