

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

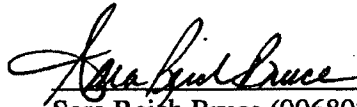
In the Matter of the Application of)	Case No. 11-349-EL-AAM
Columbus Southern Power Company and)	Case No. 11-350-EL-AAM
Ohio Power Company for Approval of)	
Certain Accounting Authority.)	

**MOTION TO INTERVENE
OF
THE OHIO AUTOMOBILE DEALERS ASSOCIATION**

The Ohio Automobile Dealers Association ("OADA") moves the Public Utilities Commission of Ohio ("Commission") to intervene, as a full party of record, in the above-captioned proceedings, pursuant to Section 4903.221 of the Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, as further explained in the attached Memorandum in Support.

WHEREFORE, The Ohio Automobile Dealers Association respectfully moves that the Public Utilities Commission of Ohio grant its motion to intervene as a full party of record.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE OF
THE OHIO AUTOMOBILE DEALERS ASSOCIATION**

I. MOTION TO INTERVENE

The Ohio Automobile Dealers Association is a trade association of approximately 850 automobile dealers throughout Ohio. Many of these members of the OADA who are customers of AEP Ohio take service under Rate Schedule GS-2.

On January 27, 2011, Columbus Southern Power Company ("CSP") and Ohio Power Company ("OPCo") (jointly AEP-Ohio) filed an application for a standard service offer ("SSO") pursuant to Section 4928.141, Revised Code. This application proposed an electric security plan ("ESP"), to be in effect for the term of January 1, 2012 through May 31, 2014, in accordance with Section 4928.143, Revised Code. The application had been developed and submitted as a single-company filing, given AEP Ohio's proposed merger of CSP and OPCo, currently pending before this Commission in Case No. 10-2376-EL-UNC.

On September 7, 2011, AEP-Ohio and other parties filed a Stipulation and Recommendation (hereinafter referred to as "the Stipulation") to resolve the issues raised in several cases pending before the Commission including the above captioned cases.

On December 14, 2011, the Commission issued its Opinion and Order adopting the Stipulation with modifications. On February 23, 2012, the Commission issued an Entry on Rehearing rejecting the Stipulation. The Commission directed AEP-Ohio to file a notice within thirty (30) days indicating whether it was prepared to proceed with its application, as filed, or whether it intended to modify or withdraw the application. On March 5, 2012, AEP-Ohio filed a notice indicating an intent to submit an application for a modified ESP by March 30, 2012. On March 30, AEP-Ohio filed an application for a modified SSO.

On April 2, 2012, the Commission issued an Entry establishing the procedural schedule in these cases. The deadline to file motions to intervene is April 20, 2012.

Section 4903.221(B) of the Revised Code, sets forth the four criteria that the Commission must consider in ruling on applications to intervene, as follows:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings;
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

In addition, the Commission has ruled, in part, that it will allow intervention by a person who has a "real and substantial interest in the proceeding" and who "is so situated that the disposition of the proceeding may . . . impair or impede (its) ability to protect that interest, unless the person's interest is adequately represented by existing parties." O.A.C. 4901-1-11.

The Ohio Automobile Dealers Association, on behalf of its members, has a real and substantial interest in this case. Many of its members are Rate Schedule GS-2 customers of AEP-Ohio. Its members will be affected by the outcome of this application. The OADA intervention will not unduly delay this proceeding or prejudice any existing party. The OADA's interests is not represented by additional or existing parties. It does not propose to sponsor witnesses in this case.

The Ohio Automobile Dealers Association submits that it meets the criteria set forth in Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code for intervention and has shown good cause why its intervention should be granted. The Commission should therefore grant the OADA's motion to intervene.

WHEREFORE, the Ohio Automobile Dealers Association respectfully moves that the Commission grant its motion to intervene as a full party of record.

Respectfully submitted,

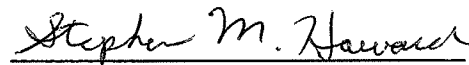


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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served this 18th day of April, 2012 via electronic mail on the following persons.


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Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Motion Motion to Intervene electronically filed by Mr. Stephen M Howard on behalf of The Ohio Automobile Dealers Association