BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

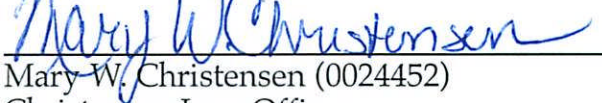
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Revised Code, in the Form of an Electric Security Plan.	)	Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO
In the Matter of the Application of of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.	)	Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM

MOTION TO INTERVENE BY

University of Toledo Innovation Enterprises Corporation

The University of Toledo ("UT") respectfully requests that the Public Utilities Commission of Ohio ("Commission") grant its motion requesting intervention in the above-named matters for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted on behalf of
The University of Toledo



Mary W. Christensen (0024452)
Christensen Law Offices
8760 Orion Place, Suite 300
Columbus OH 43240-2109
(614) 221-1832
(614) 396-0130 (Fax)
mchristensen@columbuslaw.org

MEMORANDUM IN SUPPORT

The University of Toledo ("UT") is a leader in innovation and economic development. It identifies, facilitates, stimulates and supports commercial activity that is aligned with the University's vision and mission to advance knowledge through excellence in learning, discovery and engagement, and a focus on innovation that is distinguished by exceptional strength in science and technology. The University of Toledo is helping the region become a transformative force for the world.

One critical component of UT's mission is to drive the transition of Northwest Ohio from the "Glass Capital of the World" to the "Solar Capital of the World". UT maintains over 100,000 square feet of laboratory space and a variety of campuses for industry use and collaboration, including the Wright Center for Photovoltaics and Commercialization (PVIC), the Nitschke Commercialization Complex and the Clean Energy and Alternative Energy Incubator. These assets allow UT to provide the resources necessary to support a vibrant and growing Solar Industry Cluster that has been nationally recognized as one of the top two solar clusters in the nation and has emerged as the core of a strong solar supply chain.

UT is very interested in becoming an intervener in this case because of its interest in ensuring that the 49.9 MW Turning Point Solar project ultimately is approved. The Turning Point project will source as many components as possible from Ohio Solar Supply Chain companies, and as one of the largest solar projects in the nation, will supply orders, jobs and capital investment critical to the continued development of the Ohio Solar Industry. Further, this project will supply enough panels to cause one of the world's largest photovoltaic

manufacturers, Isofoton, to build its North American Headquarters in Napoleon, Ohio.

UT further desires intervener status to defend the provisions of Ohio law and S.B. 221 (127th General Assembly) that specifically allow the Commission to order a nonbypassable charge for the purpose of new generation construction. As such, AEP's request to establish a Generation Resource Rider ("GRR") is appropriate and would serve as the mechanism by which a nonbypassable charge could be approved in a subsequent GRR case for the construction of the Turning Point Solar project.

UT meets the standards set forth in both the statute and the Commission's rules for intervention in this matter. It is, as described in Ohio Revised Code ("R.C.") Section 4903.221, a "person who may be adversely affected" by this proceeding insofar as any outcome in this proceeding may directly and indirectly affect the ability of the Northwest Ohio Solar Cluster and Ohio Solar Supply Chain to grow, the University's ability to drive Ohio, national and global innovation, and the prosperity of Ohioans learning and working in this growing industry. Further, UT's participation in this case will not unduly delay the proceedings, R.C. Section 4903.221 (B)(3).

Insofar as UT's intervention meets the criteria of Section 4903.221, it satisfies the standards set forth in the Commission's rule for intervention contained in Ohio Administrative Code Section 4901-1-11, including that its motion is timely and is made by a person with a real and substantial interest in

the outcome of this proceeding. For the foregoing reasons, UT requests that the Commission grant its request to intervene.

Respectfully submitted on behalf of
The University of Toledo

Mary W. Christensen (0024452)
Christensen Law Offices
8760 Orion Place, Suite 300
Columbus OH 43240-2109
(614) 221-1832
(614) 396-0130 (Fax)
mchristensen@columbuslaw.org

CERTIFICATE OF SERVICE

I hereby certify that this Motion to Intervene has been served upon the parties of record and other interested parties who are listed on the attached service list by e-mail or first class, postage prepaid U.S. Mail this 20th day of April 2012.

Mary W. Christensen

Mary W. Christensen

SERVICE LIST
PUCO CASE NOS. 11-346-EL-SSO, 11-348-EL-SSO
11-349-EL-AAM & 11-350-EL-AAM

Daniel R. Conway, Esq.
Porter Wright Morris & Arthur
Huntington Center
41 S. High Street
Columbus Ohio 43215

dconway@porterwright.com

David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati Ohio 45202

dboehm@BKLlawfirm.com
mkurtz@BKLlawfirm.com

Samuel C. Randazzo, Esq.
Joseph E. Oliker, Esq.
Frank P. Darr, Esq.
McNees Wallace & Nurick LLC
21 East State Street 17th floor
Columbus OH 43215

sam@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com

Steven T. Nourse, Esq.
Matthew J. Satterwhite, Esq.
Ann M. Vogel, Esq.
American Electric Power Corp.
1 Riverside Plaza 29th floor
Columbus OH 43215-2373

stnourse@aep.com
mjsatterwhite@aep.com
amvogel@aep.com

Thomas J. O'Brien, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus OH 43215

tobrien@bricker.com

Richard L. Sites, Esq.
Ohio Hospital Association
155 East Broad Street, 15th Floor
Columbus OH 43215-3620

ricks@ohanet.org

Terry L Etter, Esq.
Michael E. Idzkowski, Esq.
Maureen R. Grady, Esq.
Office of Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus OH 43215-3485

etter@occ.state.oh.us
idzkowski@occ.state.oh.us
grady@occ.state.oh.us

James F. Lang, Esq.
Laura C. McBride, Esq.
N. Trevor Alexander, Esq.
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Ave.
Cleveland OH 44114

jlang@calfee.com
lmcbride@calfee.com
talexander@calfee.com

David A. Kutik, Esq.
Allison E. Haedt, Esq.
Jones Day
901 Lakeside Avenue
Cleveland OH 44114

dakutik@jonesday.com
aehaedt@jonesday.com

Mark A. Hayden, Esq.
First Energy Service Company
76 South Main Street
Akron OH 44308

haydenm@firstenergycorp.com

Michael R. Smalz, Esq.
Joseph V. Maskovyak, Esq.
Ohio Poverty Law Center
555 Buttles Avenue
Columbus OH 43215

msmalz@ohiopovertylaw.org
jmaskovyak@ohiopovertylaw.org

Jay E. Jadwin, Esq.
American Electric Power Service Corp.
1 Riverside Plaza, 29th floor
Columbus OH 43215

jejadwin@aep.com

M. Howard Petricoff, Esq.
Stephen M. Howard, Esq.
Michael J. Settineri, Esq.
Lija Kaleps-Clark, Esq.
Benita Kahn, Esq.
Vorys, Sater, Seymour and Pease LLP
Columbus OH 43215

mhpetricoff@vorys.com
smhoward@vorys.com
mjsettineri@vorys.com
lkaleps@vorys.com
bakahn@vorys.com

Terrence O'Donnell, Esq.
Christopher Montgomery, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus OH 43215-4291

todonnell@bricker.com
cmontgomery@bricker.com

Colleen L. Mooney, Esq.
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay OH 45839-1793

cmooney2@columbus.rr.com

Lisa G. McCallister, Esq.
Matthew W. Warnock, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus OH 43215

lmcalister@bricker.com
mwarnock@bricker.com

William L. Massey, Esq.
Covington & Burling, LLP
1201 Pennsylvania Ave., N.W.
Washington DC 20004

wmassey@cov.com

Pamela A. Fox, Esq.
Christopher L. Miller, Esq.
Gregory H. Dunn, Esq.
Asim Z. Haque, Esq.
Ice Miller
250 West Street
Columbus OH 43215

pfox@hilliardohio.gov
cmiller@icemiller.com
gdunn@icemiller.com
ahaque@icemiller.com

Allen Freifeld
Samuel A. Wolfe
Viridity Energy, Inc.
100 West Elm Street, Suite 410
Conshohocken PA 19428

afreifeld@viridityenergy.com
swolfe@viridityenergy.com

Brian P. Barger, Esq.
4052 Holland-Sylvania Road
Toledo OH 43623

bpbarger@bcslawyers.com

Dane Stinson, Esq.
Bailey Cavalieri LLC
10 West Broad Street Suite 2100
Columbus OH 43215

Dane.stinson@baileycavalieri.com

Jesse A. Rodriguez, Esq.
Exelon Generation Company, LLC
300 Exelon Way
Kennett Square PA 19348

Jesse.rodrigues@exeloncorp.com

Kenneth P. Kreider, Esq.
DavidA. Meyer
Keating Muething & Klekamp PLL
One East Fourth Street Suite 1400
Cincinnati OH 45202

kpkreider@kmklaw.com
dmeyer@kmklaw.com

Gary A. Jeffries, Esq.
Dominion Resources Services, Inc.
501 Martindale Street Suite 400
Pittsburgh PA 15212

Gary.A.Jeffries@dom.com

Cynthia Fonner Brady, Esq.
David Fein, Esq.
Constellation Energy Group
550 West Washington Blvd., Suite 300
Chicago IL 60661

Cynthia.a.fonner@constellation.com
David.fein@constellation.com

Werner L. Margard III, Esq.
John Jones, Esq.
William Wright, Esq.
Thomas Lindgren
Assistant Attorneys General
Public Utilities Section
180 East Broad Street, 6th floor
Columbus OH 43215

werner.margard@puc.state.oh.us
john.jones@puc.state.oh.us
william.wright@puc.state.oh.us
thomas.lindgren@puc.state.oh.us

Henry W. Eckhart, Esq.
2100 Chambers Road, Suite 106
Columbus OH 43212

henryeckhart@aol.com

Barth E. Royer, Esq.
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus OH 43215-3927

BarthRoyer@aol.com

Sandy I-ru Grace, Esq.
Exelon Business Services Company
101 Constitution Avenue, N.W. Ste 400
Washington DC 20001

Sandy.grace@execloncorp.com

Trent A. Dougherty, Esq.
Cathryn N. Loucas, Esq.
Nolan Moser, Esq.
Ohio Environmental Council
1207 Grandview Avenue Suite 201
Columbus OH 43212-3449

Cathy@theoec.org
Nolan@theoec.org
trent@theoec.org

Mark A. Whitt, Esq.
Melissa L. Thompson, Esq.
Whitt Sturtevant LLP
PNC Plaza, Suite 2020
155 East Broad Street
Columbus OH 43215

whitt@whitt-sturtevant.com
Thompson@whitt-sturtevant.com

Mark Yurick, Esq.
Zachary D. Kravitz, Esq.
Taft Stettinius & Hollister LLP
65 East State St., Suite 1000
Columbus OH 43215

myurick@taftlaw.com
zkravitz@tastlaw.com

Tara C. Santarelli, Esq.
Environmental Law & Policy Center
1207 Grandview Ave., Suite 201
Columbus OH 43212

tsantarelli@elpc.org

David M. Stahl, Esq.
Arin C. Aragona, Esq.
Scott C. Solbery, Esq.
Eimer Stahl Klevorn & Solberg LLP
224 South Michigan Ave., Suite 1100
Chicago IL 60604

dstahl@eimerstahl.com
aaragona@eimerstahl.com
ssolberg@eimerstahl.com

Vincent Parisi, Esq.
Matthew White, Esq.
Interstate Gas Supply, Inc.
6100 Emerald Parkway
Dublin OH 43016

vparisi@igsenergy.com
mswhite@igsenergy.com

Diem N. Kaelber, Esq.
Robert Walter, Esq.
10 West Broad Street, Suite 1300
Columbus OH 43215

kaelber@buckleyking.com
walter@buckleyking.com

Emma F. Hand, Esq.
Douglas G. Bonner, Esq.
SNR Denton
1301 K Street, N.W. Suite 600
East Tower
Washington DC 20005

emma.hand@snrdenton.com
doug.bonner@snrdenton.com

Chad Endsley, Esq.
Ohio Farm Bureau Federation
280 North High Street
Columbus OH 43218-2383

cendsley@ofbf.org

Gregory M. Poulos, Esq.
EnerNOC
101 Federal Street, Suite 1100
Boston MA 02110

gpoulos@enernoc.com

Joseph M. Clark, Esq.
Direct Energy Services, LLC
Direct Energy Business, LLC
6641 North High Street Suite 200
Worthington OH 43085

jmclark@vectren.com

Steve W. Chris
Wal-Mart Stores, Inc.
2001 South East 10th Street
Bentonville AR 72716

Stephen.chriss@wal-mart.com

Judi L. Sobecki, Esq.
Randall V. Griffin, Esq.
The Dayton Power & Light Company
1065 Woodman Drive
Dayton OH 45432
A
judi.sobecki@DPLINC.com
randall.griffin@DPLINC.com

Sara Reich Bruce, Esq.
Ohio Automobile Dealers Assoc.
655 Metro Place South, Suite 270
Dublin OH 43017

sbruce@oada.com

Philip B. Sineneng, Esq.
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus OH 43215

Philip.Sineneng@ThompsonHine.com

Amy B. Spiller, Esq.
Jeanne W. Kingery, Esq.
139 East Fourth Street 1303-Main
Cincinnati OH 45202

Amy.Spiller@duke-energy.com
Jeanne.Kingery@duke-energy.com

Jay L. Kooper
Katherine Guerry
Hess Corporation
One Hess Plaza
Woodbridge NJ 07095
jkooper@hess.com
kguerry@hess.com

Glen Thomas
1060 First Avenue, Suite 400
King of Prussia PA 19406

gthomas@gtpowergroup.com

Robert Korandovich
KOREnergy
PO Box 148
Sunbury OH 43074

korenergy@insight.rr.com

Robert A. McMahon, Esq.
Eberly McMahon LLC
2321 Kemper Lane, Suite 45206
Cincinnati OH 45206

bmcmahon@emh-law.com

Rocco D'Ascenzo, Esq.
Elizabeth Watts, Esq.
Duke Energy Ohio, Inc.
139 E. Fourth St., 1303 Main
Cincinnati OH 45202

Rocco.dascenzo@duke-energy.com
Elizabeth.watts@duke-energy.com

Roger P. Sugarman, Esq.
Kegler, Brown, Hill & Ritter, LPA
65 East State Street, Suite 1800
Columbus OH 43215

rsugarman@keglerbrown.com

Matthew R. Cox, Esq.
Matthew Cox Law, Ltd.
4145 St. Theresa Blvd.
Avon OH 44011

matt@matthewcoxlaw.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/20/2012 2:51:45 PM

in

Case No(s). 11-0346-EL-SSO

Summary: Motion Motion to Intervene By University of Toledo Innovation Enterprises Corporation electronically filed by Ms. Andrea P Govan on behalf of University of Toledo Innovation Enterprises Corporation and Ms. Mary W. Christensen