

**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.	)	

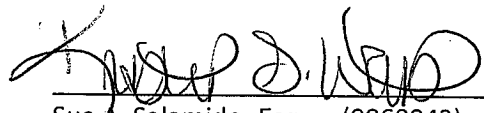
---

**MOTION TO INTERVENE  
OF  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS (IBEW) LOCAL UNION 1466**

---

Pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, The International Brotherhood of Electrical Workers, Local Union 1466 (hereinafter "IBEW Local 1466") respectfully moves the Public Utilities Commission of Ohio ("Commission") to allow it to intervene, as a full party of record, in the above captioned proceedings. A memorandum in support is attached.

Respectfully submitted,



Sue A. Salamido, Esq. (0068043)

Kristin Watson, Esq. (0078032)

Cloppert, Latanick, Sauter & Washburn

225 E. Broad St., 4<sup>th</sup> Floor

Columbus, OH 43215

Telephone: 614-461-4455

Fax: 614-621-6293

[ssalamido@cloppertlaw.com](mailto:ssalamido@cloppertlaw.com)

[kwatson@cloppertlaw.com](mailto:kwatson@cloppertlaw.com)

Attorneys for IBEW Local 1466

## MEMORANDUM IN SUPPORT OF IBEW LOCAL 1466'S MOTION TO INTERVENE

### I. PROCEDURAL BACKGROUND

IBEW Local 1466 is a labor organization representing more than five hundred electrical workers throughout Ohio. IBEW Local 1466 is party to a collective bargaining agreement with the Ohio Power Company, a subsidiary of American Electric Power. 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 R.C. §4928.141. 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 R.C. §4928.143. As a result of AEP Ohio's proposed merger of CSP and OPCo, the application had been developed and submitted as a single-company filing, and is 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 ("Stipulation") to resolve issues in the above captioned cases.

On December 14, 2011, the Commission issued its Opinion and Order adopting the Stipulation with certain modifications. Thereafter, on February 23, 2012, the Commission issued an Entry on Rehearing rejecting the Stipulation and directing AEP-Ohio to file a notice 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 its intent to submit an application for a modified ESP by March 30, 2012. On March 30, 2012, AEP-Ohio filed its 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.

R.C. §4903.221 reads, in pertinent part, that any person who may be adversely affected by a Commission proceeding may intervene in such proceeding if certain prerequisites are met. In

determining whether an application to intervene should be granted, the Commission is to consider the following:

- (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.

The Commission has since clarified the first criterion and adopted a fifth criterion to consider when ruling upon the merits of an application to intervene. As to the interest of the proposed intervenor, Ohio Administrative Code §4901-1-11(A)(2), requires the interest to be "real and substantial" and "the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest." The additional criterion adopted in §4901-1-11(B)(5) requires the Commission to consider "[t]he extent to which the person's interest is represented by existing parties."

IBEW Local 1466, on behalf of its members, has a real and substantial interest in this case which will be impaired or impeded if it is not permitted to intervene. The majority of its members are customers of AEP-Ohio who will be directly affected by the outcome of this application. However, not only are the IBEW Local 1466 members consumers, but they are employed by AEP-Ohio. Accordingly, their interests regarding wages, benefits and terms and conditions of employment will be directly affected by the outcome of this application. Moreover, the members of UAW Local 1466, as a matter of contract, are stockholders of the company, and have interests in this matter in that regard as well.

As to the second criteria, IBEW Local 1466's legal position strives to protect its members' interests as employees and stockholders by seeking to obtain adequate rate charges that will allow the employees to maintain their positions with AEP-Ohio and also protect their wages, benefits and profits as stockholders. However, IBEW Local 1466 will also be advocating for non-excessive utility charges to

protect its members' interests as consumers. Thus, the interest of IBEW Local 1466 lends to seeking the most equitable remedy possible.

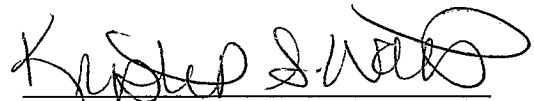
As to whether allowing IBEW Local 1466 to intervene will unduly delay this proceeding or prejudice any existing party, there is no concern here, because the deadline to intervene scheduled by the Commission has not yet passed.

Finally, IBEW Local 1466's interests are not represented by additional or existing parties because the position of its members is distinctive in that it lies on both sides of the debate.

IBEW Local 1466 submits that it meets the criteria set forth in R.C. §4903.221 and O.A.C. §4901-1-11 and that it has shown good cause why its intervention should be granted.

WHEREFORE, the IBEW Local 1466 respectfully requests that the Commission grant its motion to intervene as a full party of record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kristin Watson", is written over a horizontal line.

Sue A. Salamido, Esq. (0068043)

Kristin Watson, Esq. (0078032)

Cloppert, Latanick, Sauter & Washburn

225 E. Broad St., 4<sup>th</sup> Floor

Columbus, OH 43215

Telephone: 614-461-4455

Fax: 614-621-6293

[ssalamido@cloppertlaw.com](mailto:ssalamido@cloppertlaw.com)

[kwatson@cloppertlaw.com](mailto:kwatson@cloppertlaw.com)

Attorneys for IBEW Local 1466

## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served this 20th day of April, 2012, via **electronic mail** on the following persons:

Yazen Alami, Esq.  
[yalami@aep.com](mailto:yalami@aep.com)

Nathaniel Trevor Alexander, Esq.  
[talexander@calfee.com](mailto:talexander@calfee.com)

Deb. J. Bingham, Esq.  
[bingham@occ.state.oh.us](mailto:bingham@occ.state.oh.us)

Carys Cochern, Esq.  
[carys.cochern@duke-energy.com](mailto:carys.cochern@duke-energy.com)

Frank Darr, Esq.  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)

Trent A. Dougherty, Esq.  
[trent@theoeg.com](mailto:trent@theoeg.com)

Jennifer Duffer, Esq.  
[jduffer@ameritech.net](mailto:jduffer@ameritech.net)

Carolyn S. Flahive, Esq.  
[carolyn.flahive@thompsonhine.com](mailto:carolyn.flahive@thompsonhine.com)

Mark A. Hayden, Esq.  
[haydenm@firstenergycorp.com](mailto:haydenm@firstenergycorp.com)

Stephen M. Howard, Esq.  
[smhoward@vorys.com](mailto:smhoward@vorys.com)

Diem N. Kaebler, Esq.  
[kaelber.@buckleyking.com](mailto:kaelber.@buckleyking.com)

Lija Kaleps-Clark, Esq.  
[lkalepsclark@vorys.com](mailto:lkalepsclark@vorys.com)

James F. Lang, Esq.  
[jlang@calfee.com](mailto:jlang@calfee.com)

Dianne Kuhnell, Esq.  
[dianne.kuhnell@duke-energy.com](mailto:dianne.kuhnell@duke-energy.com)

Michael L. Kurtz, Esq.  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)

David A. Kutik, Esq.  
[dakutik@jonesday.com](mailto:dakutik@jonesday.com)

Vicki Leach-Payne, Esq.  
[vleach-payne@mwncmh.com](mailto:vleach-payne@mwncmh.com)

Patti Mallarnee, Esq.  
[mallarnee@occ.state.oh.us](mailto:mallarnee@occ.state.oh.us)

Laura C. McBride, Esq.  
[lmcbride@calfe.com](mailto:lmcbride@calfe.com)

Christen M. Moore, Esq.  
[cmoore@porterwright.com](mailto:cmoore@porterwright.com)

Nolan M. Moser, Esq.  
[nolan@theoec.org](mailto:nolan@theoec.org)

Steven T. Nourse, Esq.  
[stnourse@aep.com](mailto:stnourse@aep.com)

Joseph E. Olikier, Esq.  
[joliker@mwncmh.com](mailto:joliker@mwncmh.com)

Teresa Orahood, Esq.  
[torahood@bricker.com](mailto:torahood@bricker.com)

M. Howard Petricoff, Esq.  
[mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)

Gregory J. Poulos, Esq.  
[gpoulos@enernoc.com](mailto:gpoulos@enernoc.com)

Matthew R. Pritchard, Esq.  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)

Samuel C. Randazzo, Esq.  
[sam@mwncmh.com](mailto:sam@mwncmh.com)

David C. Rinebolt, Esq.  
[drinebolt@ohiopartners.org](mailto:drinebolt@ohiopartners.org)

Tara Santarelli, Esq.  
[tsantarelli@elpc.org](mailto:tsantarelli@elpc.org)

Matthew J. Satterwhite, Esq.  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

Melissa L. Thompson, Esq.  
[Thompson@whitt-sturtevant.com](mailto:Thompson@whitt-sturtevant.com)

Anne M. Vogel, Esq.  
[amvogel@aep.com](mailto:amvogel@aep.com)

Mark A. Whitt, Esq.  
[whit@whitt-sturtevant.com](mailto:whit@whitt-sturtevant.com)

Mark Yurick, Esq.  
[myurick@taftlaw.com](mailto:myurick@taftlaw.com)

I certify that a copy of the foregoing document was served this 20th day of April, 2012, via **regular U.S. mail** on the following persons:

TREVOR N. ALEXANDER, ESQ.  
CALFEE HALTER & GRISWOLD LLP  
1100 FIFTH THIRD CENTER  
21 EAST STATE STREET  
COLUMBUS, OH 43215-4243

CHRISTOPHER J. ALLWEIN, ESQ.  
1373 GRANDVIEW AVE  
SUITE 212  
COLUMBUS, OH 43212  
[CALLWEIN@WILLIAMSANDMOSER.COM](mailto:CALLWEIN@WILLIAMSANDMOSER.COM)

LEO ANTONS  
1237 CISLER DR  
MARIETTA, OH 45750  
[LEONANTONS@SUDDENLINK.NET](mailto:LEONANTONS@SUDDENLINK.NET)

BRIAN BARGER  
OHIO CONSTRUCTION MATERIALS COALITION NONE  
4052 HOLLAND-SYLVANIA ROAD  
TOELDO, OH 43623

JOHN BENTINE, ESQ.  
AMERICAN MUNICIPAL POWER, INC.  
1111 SCHROCK ROAD  
SUITE 100  
COLUMBUS, OH 43229  
[JBENTINE@AMPPARTNERS.ORG](mailto:JBENTINE@AMPPARTNERS.ORG)

PAUL BERTRAM III  
MARIETTA CITY COUNCIL  
308 PUTNAM STREET  
MARIETTA, OH 45750

DAVID BOEHM  
OHIO ENERGY GROUP, INC.  
36 E. SEVENTH STREET  
SUITE 1510  
CINCINNATI, OH 45202  
OHIOENERGYGROUP@BKLLAWFIRM.COM

KURT J. BOEHM, ESQ.  
BOEHM, KURTZ & LOWRY  
36 E SEVENTH STREET  
SUITE 1510  
CINCINNATI, OH 45202

TRACY BRADFORD  
CITY OF HILLIARD ASSISTANT LAW DIRECTOR NONE  
3800 MUNICIPAL WAY  
HILLIARD, OH 43026  
TBRADFORD@HILLIARDOHIO.GOV

MATT BRAKEY  
BRAKEY ENERGY  
P.O. BOX 202720  
CLEVELAND, OH 44120-8128

TIFFANY CHETOCK  
MADISON TOWNSHIP TRUSTEES  
13174 ST. RT. 45  
LISBON, OH 44432

JOSEPH CLARK  
VECTREN RETAIL, LLC DBA VECTREN SOURCE  
6641 NORTH HIGH ST., SUITE 200  
WORTHINGTON, OH 43085

KRISTEN COCANOUGH, ESQ.  
DUKE ENERGY  
139 EAST FOURTH ST 1202 MAIN  
CINCINNATI, OH 45202



FRANK P. DARR, ESQ.  
MCNEES WALLACE & NURICK LLC  
21 EAST STATE STREET, 17TH FLOOR  
COLUMBUS, OH 43215  
FDARR@MWNCMH.COM

MICHAEL DAVENPORT, PRESIDENT  
MEIGS COUNTY COMMISSIONERS  
100 EAST SECOND ST.  
POMEROY, OH 45769

BILL DINGUS  
LAWRENCE ECONOMIC DEVELOPMENT CORPORATION  
P.O. BOX 488  
SOUTH POINT, OH 45680-0488

TRENT A. DOUGHERTY, ESQ.  
OHIO ENVIRONMENTAL COUNCIL  
1207 GRANDVIEW AVE., SUITE 201  
COLUMBUS, OH 43212

DUKE ENERGY COMMERCIAL ASSET MANAGEMENT, INC.  
139 E. FOURTH STREET, 1303-MAIN  
P.O. BOX 961  
CINCINNATI, OH 45201-0960

HENRY W. ECKHART, ESQ.  
1200 CHAMBERS ROAD STE 106  
COLUMBUS, OH 43212

CHAD A. ENDSLEY  
OHIO FARM BUREAU FEDERATION  
280 N. HIGH STREET, PO BOX 182383  
COLUMBUS, OH 43218-2383

TERRY ETTER, ESQ.  
OHIO CONSUMERS' COUNSEL  
10 W. BROAD STREET  
SUITE 1800  
COLUMBUS, OH 43215

ROGER R. GEIGER  
NATIONAL FEDERATION OF INDEPENDENT BUSINESS -OHIO  
10 WEST BROAD STREET  
SUITE 2450  
COLUMBUS, OH 43215

SANDY I. GRACE, ESQ.  
101 CONSTITUTION AVENUE  
SUITE 400 EAST  
WASHINGTON, DC 20001

MAUREEN GRADY, ESQ.  
OFFICE OF CONSUMERS' COUNSEL  
10 W. BROAD STREET  
SUITE 1800  
COLUMBUS, OH 43215-3485

GRANT W. GARBER, ESQ.  
JONES DAY  
P.O. BOX 165017  
325 JOHN H MCCONNELL BLVD. STE 600  
COLUMBUS, OH 43215-2673

ALLISON E. HAEDT, ESQ.  
JONES DAY  
325 JOHN H. MCCONNELL BLVD., SUITE 600  
COLUMBUS, OH 43215-2673  
[AEHAEDT@JONESDAY.COM](mailto:AEHAEDT@JONESDAY.COM)

EMMA F. HAND, ESQ.  
SONNENSCHN NATH & ROSENTHAL LLP  
1301 K STREET NW  
SUITE 600 EAST TOWER  
WASHINGTON, DC 20005  
[EHAND@SONNENSCHN.COM](mailto:EHAND@SONNENSCHN.COM)

ASIM Z. HAQUE, ESQ.  
ICE MILLER LLP  
250 WEST STREET  
COLUMBUS, OH 43215  
[ASIM.HAQUE@ICEMILLER.COM](mailto:ASIM.HAQUE@ICEMILLER.COM)

STEPHEN HOWARD  
RETAIL ENERGY SUPPLY ASSOCIATION (RESA)  
52 E. GAY ST.  
COLUMBUS, OH 43215

JAY E. JADWIN, ESQ.  
AMERICAN ELECTRIC POWER SERVICE CORPORATION  
1 RIVERSIDE PLAZA, 29TH FLOOR  
COLUMBUS, OH 43215  
[JEJADWIN@AEP.COM](mailto:JEJADWIN@AEP.COM)

TODD C. JONES, ESQ.  
C/O CHRISTOPHER MILLER  
250 WEST STREET  
COLUMBUS, OH 43215

J. KENNEDY AND ASSOCIATES  
570 COLONIAL PARK DRIVE  
SUITE 305  
ROSWELL, GA 30075

ZACHARY D. KRAVITZ, ESQ.  
CHESTER, WILCOX & SAXBE, LLP  
65 EAST STATE STREET, STE 1000  
COLUMBUS, OH 43215  
[zkravitz@cwsllaw.com](mailto:zkravitz@cwsllaw.com)  
[zkravitz@taftlaw.com](mailto:zkravitz@taftlaw.com)

KENNETH P. KREIDER, ESQ.  
KEATING, MUETHING & KLEKAMP PLL  
ONE EAST FOURTH STREET, SUITE 1400  
CINCINNATI, OH 45202  
[KPKREIDER@KMKLAW.COM](mailto:KPKREIDER@KMKLAW.COM)

MICHAEL KURTZ, ESQ.  
BOEHM KURTZ & LOWRY  
36 EAST SEVENTH STREET, SUITE 1510  
CINCINNATI OH 45202  
[MKURTZ@BKLLAWFIRM.COM](mailto:MKURTZ@BKLLAWFIRM.COM)

CATHRYN N. LOUCAS  
THE OHIO ENVIRONMENTAL COUNCIL  
1207 GRANDVIEW AVE.  
COLUMBUS, OH 43212

WILLIAM L. MASSEY, ESQ.  
COVINGTON & BURLING LLP  
1201 PENNSYLVANIA AVENUE, NW  
WASHINGTON, DC 20004-2401

LISA G. MCALISTER, ESQ.  
BRICKER & ECKLER  
100 SOUTH THIRD STREET  
COLUMBUS, OH 43215-4291  
[LMCALISTER@BRICKER.COM](mailto:LMCALISTER@BRICKER.COM)

TERRENCE A. MEBANE, ESQ.  
THOMPSON HINE LLP  
41 S. HIGH STREET SUITE 1700  
COLUMBUS, OH 43215

DAVID A. MEYER  
ONE EAST FOURTH STREET  
SUITE 1400  
CINCINNATI, OH 45202

CHRISTOPHER L. MILLER, ESQ.  
ICE MILLER LLC  
250 WEST STREET  
COLUMBUS, OH 43215  
[CHRISTOPHER.MILLER@ICEMILLER.COM](mailto:CHRISTOPHER.MILLER@ICEMILLER.COM)

CHRISTOPHER L. MILLER, IC  
CITY OF GROVE CITY  
250 WEST STREET  
COLUMBUS, OH 43215

CHRISTOPHER MONTGOMERY, ESQ.  
BRICKER & ECKLER LLP  
100 SOUTH THIRD STREET  
COLUMBUS, OH 43215

COLLEEN MOONEY, ESQ.  
231 WEST LIMA STREET  
FINDLAY, OH 45840

NATURAL RESOURCES DEFENSE COUNCIL  
50 W BROAD STREET  
SUITE 2117  
COLUMBUS, OH 43215  
[HENRYECKHART@AOL.COM](mailto:HENRYECKHART@AOL.COM)

STEVEN T. NOURSE  
AMERICAN ELECTRIC POWER  
1 RIVERSIDE PLAZA  
COLUMBUS, OH 43215

THOMAS O'BRIEN, ESQ.  
BRICKER & ECKLER LLP  
100 SOUTH THIRD STREET  
COLUMBUS, OH 43215-4291  
[TOBRIEN@BRICKER.COM](mailto:TOBRIEN@BRICKER.COM)

TERRENCE O'DONNELL, ESQ.  
BRICKER & ECKLER LLP  
100 SOUTH THIRD STREET  
COLUMBUS, OH 43215  
[TODONNELL@BRICKER.COM](mailto:TODONNELL@BRICKER.COM)

OHIO POWER COMPANY  
LEGAL DEPARTMENT  
1 RIVERSIDE PLAZA 29TH FLOOR  
COLUMBUS, OH 43215

M.H. PETRICOFF, ESQ.  
CONSTELLATION ENERGY COMMODITIES GROUP, INC.  
52 EAST GAY STREET P O BOX 1008  
COLUMBUS, OH 43216-1008

GREGORY J. POULOS, ESQ.  
ENERNOC, INC.  
101 FEDERAL STREET SUITE 1100  
BOSTON, MA 02110

TERESA RINGENBACK  
DIRECT ENERGY BUSINESS LLC MANAGER  
GOVERNMENT & REGULATORY AFFAIRS  
9605 EL CAMINO  
PLAIN CITY, OH 43064  
[TERESA.RINGENBACH@DIRECTENERGY.COM](mailto:TERESA.RINGENBACH@DIRECTENERGY.COM)

JESSEE A. RODRIGUEZ, ESQ.  
300 EXELON WAY  
KENNETT SQUARE, PA 19348

BARTH E. ROYER, ESQ.  
BELL & ROYER CO LPA  
33 SOUTH GRANT AVENUE  
COLUMBUS, OH 43215-3927  
[BarthRoyer@aol.com](mailto:BarthRoyer@aol.com)

THE SIERRA CLUB  
50 WEST BROAD STREET #2117  
COLUMBUS, OH 43215

RICHARD SITES, ESQ.  
OHIO HOSPITAL ASSOCIATION  
155 EAST BROAD STREET 15TH FLOOR  
COLUMBUS, OH 43215-3620  
[RICKS@OHANET.ORG](mailto:RICKS@OHANET.ORG)

HOLLY RACHEL SMITH, ESQ.  
KEATING MUETHING & KLEKAMP PLL  
HITT BUSINESS CENTER  
3803 RECTORTOWN ROAD  
MARSHALL, VA 20115

STEPHEN J. SMITH, ESQ.  
250 WEST STREET  
COLUMBUS, OH 43215  
[SJSMITH@SZD.COM](mailto:SJSMITH@SZD.COM)

AMY SPILLER, ESQ.  
DUKE ENERGY OHIO  
139 E. FOURTH STREET, 1303-MAIN  
PO BOX 961  
CINCINNATI, OH 45201-0960  
[AMY.SPILLER@DUKE-ENERGY.COM](mailto:AMY.SPILLER@DUKE-ENERGY.COM)

DANE STINSON, ESQ.  
BAILEY CAVALIERI LLC  
10 WEST BROAD STREET SUITE 2100  
COLUMBUS, OH 43215  
[DANE.STINSON@BAILEYCAVALIERI.COM](mailto:DANE.STINSON@BAILEYCAVALIERI.COM)

VAN WERT COUNTY COMMISSIONERS NONE  
120 E. MAIN STREET  
VAN WERT, OH 45891-1704

VINCENT PARISI  
INTERSTATE GAS SUPPLY INC  
6100 EMERALD PARKWAY  
DUBLIN, OH 43016  
[VPARISI@IGSENERGY.COM](mailto:VPARISI@IGSENERGY.COM)


MATTHEW SATTERWHITE, ESQ.  
1 RIVERSIDE PLAZA 29TH FLOOR  
COLUMBUS, OH 43215  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

MICHAEL SMALZ, ESQ.  
OHIO STATE LEGAL SERVICE ASSOC.  
555 BUTTLES AVENUE  
COLUMBUS, OH 43215-1137

TUSCARAWAS COUNTY  
330 UNIVERSITY DRIVE NE  
NEW PHILADELPHIA, OH 44663

UNITED WAY OF JEFFERSON COUNTY  
501 WASHINGTON STREET  
P.O. BOX 1463  
STEUBENVILLE, OH 43952

SCOTT WHITE  
INTERSTATE GAS SUPPLY, INC.  
6100 EMERALD PKWY  
DUBLIN, OH 43016

  
Kristin Watson, Esq.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/20/2012 4:01:55 PM**

**in**

**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 Kristin S Watson on behalf of  
IBEW Local Union 1466