

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)	
Company to Establish Initial Storm Damage)	Case No. 12-3255-EL-RDR
Recovery Rider Rates.)	

MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), 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



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MEMORANDUM IN SUPPORT

On December 21, 2012, Ohio Power Company (“OP”) filed an application to establish its Storm Damage Recovery Rider. In its application, OP seeks to recover \$61.8 million in costs incurred as a result of three storms that cause damage to OP’s power systems during calendar year 2012.

The members of OMAEG will be impacted by the Commission’s decision relating to OP’s application, 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 OP, 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 Section 4903.221, Revised Code, and Rule 4901-1-11(B), O.A.C., 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 Section 4903.221, Revised Code, and Rule 4901-1-11, O.A.C.

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 11th day of February 2013 *via* email transmission or first class mail.



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Summary: Motion to Intervene and Memorandum in Support electronically filed by J. Thomas Siwo on behalf of OMA Energy Group