

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|---|-------------|-------------------------|
| In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company |))) | Case No. 12-3133-EL-FAC |
| In the Matter of the Fuel Adjustment Clauses for Ohio Power Company |)) | Case No. 13-572-EL-FAC |
| In the Matter of the Fuel Adjustment Clauses for Ohio Power Company |)) | Case No. 13-1286-EL-FAC |
| In the Matter of the Fuel Adjustment Clauses for Ohio Power Company |)) | Case No. 13-1892-EL-FAC |

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF INDUSTRIAL ENERGY USERS-OHIO**

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MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The above-captioned cases relate to quarterly Fuel Adjustment Clause ("FAC") filings for Ohio Power Company ("AEP-Ohio"). On October 23, 2013, the Commission issued an Entry in the above-captioned cases, as well as Case No. 11-5906-EL-FAC (collectively "*2012-2014 FAC Audit Cases*"), directing its Staff to issue a request for proposal ("RFP") for auditing services to audit AEP-Ohio's FAC for 2012, 2013, and 2014. On December 4, 2013, the Commission issued an Entry in the *2012-2014 FAC Audit Cases* selecting Energy Ventures Analysis, Inc. ("EVA") as the auditor of AEP-Ohio's FAC for 2012, 2013 and 2014. AEP-Ohio filed an Application for Rehearing

of the December 4, 2013 Entry in the *2012-2014 FAC Audit Cases*. The Commission has already granted IEU-Ohio intervention in Case No. 11-5906-EL-FAC.¹

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned cases, and is so situated that the disposition of these cases may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay these cases and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these cases. The interests of IEU-Ohio will not be adequately represented by other parties to these cases and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard
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¹ *In the Matter of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters*, Case No. 11-5906-EL-FAC, Finding and Order at 3 (March 28, 2012).

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU").

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to SB 221, and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as these cases may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in these cases is the result of the effect that these cases shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was served upon the following parties of record this 13th day of January 2014 via electronic transmission, hand-delivery or first class mail, U.S. postage prepaid.

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ATTORNEY EXAMINERS

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Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio