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Via E-File

February 4, 2014

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: <u>Case Nos. 11-5906-EL-FAC, 12-3133-EL-FAC, 13-572-EL-FAC, 13-1286-EL-FAC, 13-1892-EL-FAC</u>

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT for filing in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

Kurk ~ David F. Boehm, Esq.

Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq. BOEHM, KURTZ & LOWRY

MLKkew Encl. Cc: Certificate of Service

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters.	•	Case No. 11-5906-EL-FAC
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 OF THE OHIO ENERGY GROUP

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

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David F. Boehn, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq. **BOEHM, KURTZ & LOWRY** 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Ph: (513) 421-2255 Fax: (513) 421-2764 E-Mail: dboehm@BKLlawfirm.com mkurtz@BKLlawfirm.com jkylercohn@BKLlawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

February 4, 2014

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the Fuel Adjustment Clauses for Columbus Southern Power Company and Ohio Power Company and Related Matters.	: (Case No. 11-5906-EL-FAC
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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

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, OEG files this Memorandum in Support of its Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Commission. OEG's members who are participating in this intervention are: AK Steel Corporation, Aleris International, Inc., Amsted Rail Company, Inc. ArcelorMittal, USA, E.I. duPont de Nemours and Company, Ford Motor Company, GE Aviation, Linde, Inc., Praxair Inc., The Timken Company and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

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February 4, 2014

COUNSEL FOR THE OHIO ENERGY GROUP

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 4th day of February, 2014 to the following:

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David F. Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

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Case No(s). 11-5906-EL-FAC, 12-3133-EL-FAC, 13-0572-EL-FAC, 13-1892-EL-FAC, 13-1286-EL-FAC

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group