

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for Authority to)	Case No. 13-2385-EL-SSO
Establish a Standard Service Offer)	
Pursuant to §4928.143, Revised Code,)	
in the Form of an Electric Security Plan.)	

In the Matter of the Application of)	
Ohio Power Company for Approval of)	Case No. 13-2386-EL-AAM
Certain Accounting Authority.)	

**APPALACHIAN PEACE AND JUSTICE NETWORK’S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

The Appalachian Peace and Justice Network (“APJN”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned cases pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission’s Code of Rules and Regulations. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

/s/ Michael R. Smalz
Michael R. Smalz, Counsel of Record (0041897)
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 3215-1137
Telephone: (614) 824-2502
e-mail: msmalz@ohiopovertylaw.org

/s/ Peggy P. Lee
Peggy P. Lee (0067912)
Southeastern Ohio Legal Services
964 E. State Street
Athens, Ohio 45701
T: (740) 594-3558
F: (740) 594-3791
plee@oslsa.org

ATTORNEYS FOR THE APPALACHIAN
PEACE AND JUSTICE NETWORK

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

The Appalachian Peace and Justice Network (“APJN”) should be permitted to intervene in these applications pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced applications were made by Ohio Power Company for authority to establish a standard service offer in the form of an electric security plan and for approval of certain accounting authority.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. APJN meets all four criteria for intervention in these matters.

APJN is a nonprofit organization that empowers and challenges groups and individuals to work for peace and social justice. It has approximately 200 members in southeastern

(Appalachian) Ohio; the majority of its members are low-income and many of its members are customers or consumers of electric service provided by the Ohio Power Company. APJN engages in a wide range of educational and advocacy efforts to promote peace, social justice, and consumer protections for low-income residents of Appalachian Ohio. It has one part-time paid director//organizer (and one grant-funded staff person working on sexual assault prevention project), and its principal office is located in Athens, Ohio.

Further, APJN previously intervened in and actively participated in the AEP 2009 SEET case, PUCO Case No. 10-1261-EL-UNC, in the Companies' ESP II case, PUCO Case Nos. 11-346-EL-SSO and 11-348-EL-SSO, and In the Companies' distribution rate case, PUCO Case Nos. 11-351-EL-AIR and 11-351-EL-AI, AND IN THE AEP Program Portfolio Plan case, PUCO Case Nos. 11-5568-EL-POR and 11-5569-EL-POR.

APJN members are also non-residential ratepayers of Ohio Power Company. Further, APJN has been recognized by the Commission in the past as an advocate for low-income consumers in Appalachian Ohio, many of whom will be affected by the outcome of these applications. APJN's primary interest in these cases is to protect the interests of low-income Ohioans and, particularly rural consumers and consumers in Appalachian Ohio.

For the above reasons, APJN has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede APJN's ability to protect its interests. No other party to the matters will adequately represent the interests of APJN. APJN is the only intervenor that primarily serves as an advocate for low-income residential consumers in rural and Appalachian (Southeastern) Ohio residential consumers. APJN's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these proceedings. Additionally, this Motion

to Intervene is being filed with the PUCO more than a full month before the March 7, 2014 filing deadline set by the Attorney Examiner's January 24, 2014 Entry in this proceeding. Therefore, APJN's intervention in these proceedings should be granted.

Respectfully submitted,

/s/ Michael R. Smalz

Michael R. Smalz, Counsel of Record (0041897)
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 3215-1137
Telephone: (614) 824-2502
e-mail: msmalz@ohiopovertylaw.org

/s/ Peggy P. Lee

Peggy P. Lee (0067912)
Southeastern Ohio Legal Services
964 E. State Street
Athens, Ohio 45701
T: (740) 594-3558
F: (740) 594-3791
plee@oslsa.org

ATTORNEYS FOR THE APPALACHIAN
PEACE AND JUSTICE NETWORK

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support was served electronically on these parties on this 4th day of February 2014.

/s/ Michael R. Smalz

Michael R. Smalz

STEVEN T. NOURSE
MATTHEW J. SATTERWHITE
American Electric Power Corp

MAUREEN R. GRADY
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800

1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
mjsatterwhite@aep.com

SAMUEL C. RANDAZZO
MATTHEW PRITCHARD
JOSEPH E. OLIKER
FRANK P. DARR
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, Ohio 43215
sam@mwncmh.com
mpritchard@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com

THOMAS MCNAMEE
WILLIAM WRIGHT
Attorney General's Office
Public Utilities Commission Section
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215-3793
thomas.mcnamee@puc.state.oh.us
williamwright@puc.state.oh.us

THOMAS J. O'BRIEN
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
tobrien@bricker.com
dborchers@bricker.com

RICHARD SITES
Ohio Hospital Association
155 E. Broad Street, 15th Floor
Columbus, Ohio 43215
ricks@ohanet.org

MARK A. HAYDEN
JACOB A. MCDERMOTT
SCOTT J. CASTO
FirstEnergy Service Corp.
76 South Main Street
Akron, Ohio 44308
haydenm@firstenergycorp.com

Columbus, Ohio 43212
grady@occ.state.oh.us

DAVID F. BOEHM
MICHAEL L. KURTZ
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com
jklyercohn@BKLawfirm.com

KIMBERLY W. BOJKO
MALLORY MOHLER
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
bojko@carpenterlipps.com
mohler@carpenterlipps.com

PHILIP B. SINENENG
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, Ohio 43215
Philip.Sineng@ThompsonHine.com

ROCCO D'ASCENZO
Duke Energy Ohio
139 East Fourth Street
Cincinnati, Ohio 45202
Rocco.dascenzo@duke-energy.com

MARK A. WHITT
ANDREW J. CAMPBELL
GREGORY L. WILLIAMS
Whitt Sturtevant LLP
86 East Broad Street
Columbus, Ohio 43215
whitt@whitt-sturtevant.com

jmcdermott@firstenergycorp.com
scasto@firstenergycorp.com

campbell@whitt-sturtevant.com
williams@whitt-sturtevant.com

BARTH E. ROYER
Bell & Royer LPA
33 South Grant Avenue
Columbus, Ohio 43215
BarthRoyer@aol.com

VINCENT PARISI
LAWRENCE FRIEDEMANN
MATTHEW WHITE
Interstate Gas Supply
6100 Emerald Parkway
Dublin, Ohio 43016
vparisi@igsenergy.com
lfriedeman@igsenergy.com
mswhite@igsenergy.com

JOHN FINNIGAN
Environmental Defense Fund
128 Winding Brook Lane
Terrace Park, Ohio 45174
Telephone: (513) 226-9558
jfinnigan@edf.org

MARK S. YURICK
ZACHARY D. KRAVITZ
Taft Stettinius & Hollister LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215
Telephone: (614) 221-2838
Facsimile: (614) 221-2007
myurick@taftlaw.com
zkravitz@taftlaw.com

DANIEL R. CONWAY
Porter Wright Morris & Arthur
Hunington Center
41 S. High Street
Columbus, Ohio 43215
dconway@porterwright.com

GARY A. JEFFRIES
Dominion Resources Services
501 Martindale Street, Suite 400
Pittsburgh, Pennsylvania 15212
Gary.A.Jeffries@dom.com

COLLEEN L. MOONEY
CATHRYN N. LOUCAS
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
Telephone: (419) 425-8860
cmooney@ohiopartners.org
cloucas@ohiopartners.org

JUDI L. SOBECKI
The Dayton Power and Light Company
1065 Woodman Drive
Dayton, Ohio 45432
Telephone: (937) 259-7171
Facsimile: (937) 259-7178
judi.sobecki@aes.com

TRENT DOUGHERTY
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212-3449
Telephone: (614) 487-7506
Facsimile: (614) 487-7510
tdougherty@theOEC.org

JOSEPH M. CLARK
Direct Energy
21 East State Street, 19th Floor
Columbus, Ohio 43215
joseph.clark@directenergy.com

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Case No(s). 13-2385-EL-SSO, 13-2386-EL-AAM

Summary: Motion Appalachian Peace and Justice Network's Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael R. Smalz on behalf of Appalachian Peace and Justice Network