

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Authority to)	
Establish a Standard Service Offer)	Case No. 13-2385-EL-SSO
Pursuant to R.C. 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 Certain)	Case No. 13-2386-EL-AAM
Accounting Authority.)	

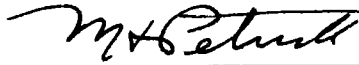
**MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, the Retail Energy Supply Association (“RESA”)¹ moves to intervene in this proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, RESA respectfully requests that the Commission grant this motion to intervene as a full party of record.

¹ RESA’s members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG Energy, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

Respectfully Submitted,



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**MEMORANDUM IN SUPPORT OF THE MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

On December 20, 2013, Ohio Power Company (“AEP Ohio”) filed an application for a Standard Service Offer pursuant to Section 4928.141, Revised Code (“ESP III”). AEP Ohio’s current Electric Security Plan will expire on May 31, 2015. AEP Ohio is proposing an Electric Security Plan that will take effect for the three years immediately thereafter (from June 2015 through May 2018). The Public Utilities Commission of Ohio (“Commission”) has established deadlines for intervention and testimony in these cases.

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code (“OAC”), establish the standard for intervention as a full party of record. Rule 4901-1-11, OAC, states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.

In addition to establishment of a direct interest, the factors that the Commission considers in implementing the above rule are the nature of the intervenor’s interest, the extent that interest is represented by existing parties, the intervenor’s potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. *See also*, Section 4903.221(B), Revised Code, upon which the above rule is authorized. A review of these factors in light of following facts supports granting RESA’s intervention.

RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. Several RESA members are certificated as competitive retail electric service providers, are active in the Ohio retail electric and natural gas markets, and provide service to residential, commercial, industrial and governmental customers, including customers in AEP's service territory.

RESA's members have existing and potential business interests in AEP Ohio's service territory that will be affected by the outcome of these proceedings. The Commission's decision in this matter may affect the viability of RESA's members to provide electric power and other products and services to retail service customers in AEP Ohio's service territory during the proposed ESP III term. For example, AEP Ohio has proposed a purchase of receivables ("POR") program for its service territory. POR is an offering for which RESA has long advocated and the disposition of that one request alone will have a bearing on the competitive market in AEP Ohio's service territory. Additionally, RESA actively participated in AEP Ohio's ESP II cases, 11-346-EL-SSO et al., and in related ongoing cases – AEP Ohio's proposed supplier tariff modifications, Case No. 13-729-EL-ATA, and AEP Ohio's transition to market rates case, Case No. 13-1530-EL-UNC. The extensive experience of the members of RESA in matters regarding the development of competitive retail markets will assist the Commission in the development of a more complete record in this matter.

This motion for intervention precedes the March 7, 2014 deadline established by the Attorney Examiner. The motion is also being filed well in advance of the hearing. Thus, the intervention is timely and should not unduly delay the instant proceedings. Finally, because of its unique expertise and participation in the competitive retail in Ohio and across the country,

RESA's interests are not represented by the existing parties.² RESA will be able to assist in the development of a full and complete record to assist the Commission in its consideration of AEP Ohio's proposals.

WHEREFORE, RESA respectfully requests that the Commission grant this motion to intervene as a full party of record.

Respectfully Submitted,



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² A number of motions to intervene are pending, some of which were filed by competitive retail electric suppliers. None of those hopeful intervenors will represent RESA's interests.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Intervene was served this 10th day of February 2014 by electronic mail, upon the persons listed below.


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

Summary: Motion to Intervene electronically filed by M HOWARD PETRICOFF on behalf of
Retail Energy Supply Association