

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

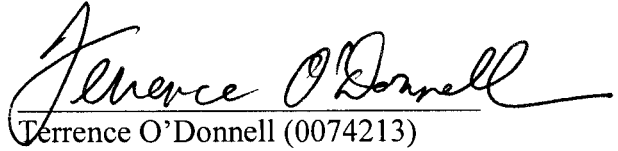
In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	Case No: 14-1693-EL-RDR
Proposal to Enter into an Affiliate)	
Power Purchase Agreement for)	
Inclusion in the Power Purchase)	
Agreement Rider)	

In the Matter of the Application of)	Case No: 14-1694-EL-AAM
Ohio Power Company for Approval of)	
Certain Accounting Authority)	

**MOTION TO INTERVENE OF
THE MID-ATLANTIC RENEWABLE ENERGY COALITION**

Pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("O.A.C.") Rule 4901-1-11, the Mid-Atlantic Renewable Energy Coalition ("MAREC") respectfully moves for leave to intervene in the above-captioned proceedings. The Public Utilities Commission of Ohio ("Commission") should grant this Motion to Intervene because MAREC has a real and substantial interest in these proceedings, and the Commission's disposition of these proceedings may impair or impede MAREC's ability to protect that interest. MAREC believes that its participation will not unduly prolong or delay these proceedings and that MAREC will significantly contribute to the full development and equitable resolution of the issues in these proceedings. Additionally, MAREC's interests will not be adequately represented by other parties in these proceedings. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, MAREC respectfully requests that the Commission grant this Motion to Intervene.

Respectfully Submitted,

A handwritten signature in black ink, reading "Terrence O'Donnell". The signature is fluid and cursive, with a long horizontal stroke at the end.

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MEMORANDUM IN SUPPORT

The above-captioned proceedings were initiated by the Ohio Power Company (“AEP Ohio” or the “Company”) on October 3, 2014. The Company initiated these proceedings seeking approval of a power purchase agreement with its unregulated affiliate to include in its Power Purchase Agreement Rider (the “PPA Rider”).

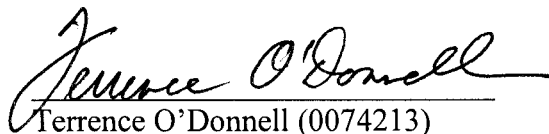
MAREC should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests in the proceedings. MAREC is a coalition of diverse wind developers, turbine manufacturers, and public interest organizations formed to educate policy makers and the general public about renewable energy issues in the PJM territory. MAREC also collaborates with other renewable energy industry partners. MAREC’s mission is to ensure that wind power establishes itself as one of the region’s leading energy resources, providing substantial environmental and economic benefits. MAREC believes that the ultimate resolution of the matters to be addressed in these proceedings—including, without limitation, the potential approval of the PPA Rider as proposed by the Company—could have a substantial

effect on the development of wind energy and other forms of renewable energy throughout the state and region.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, MAREC is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceedings and will not unduly delay the proceedings or prejudice any existing party. MAREC submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns that are set forth in these proceedings; that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party; and that its participation will help ensure that the proceedings are fair to its membership.

WHEREFORE, MAREC respectfully requests that its motion to intervene be granted.

Respectfully Submitted,

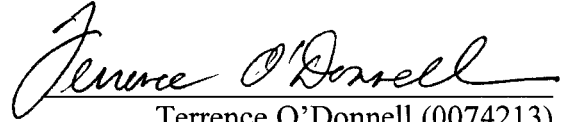
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***Attorney for Mid-Atlantic Renewable
Energy Coalition***

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Intervene and Memorandum in Support was served by electronic mail upon the following Parties of Record on this 17th day of October, 2014.


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in

Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Terrence O'Donnell on behalf of Mid-Atlantic Renewable Energy Coalition