

**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 Ohio)	Case No. 14-1694-EL-AAM
Power Company for Approval of Certain)	
Accounting Authority)	
)	

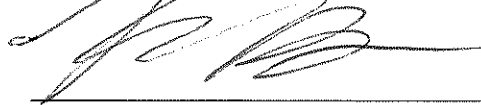
**MOTION TO INTERVENE OF
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, the Ohio Manufacturers' Association Energy Group (OMAEG) hereby respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in the above-captioned matter with the full powers and rights granted to intervening parties.

As demonstrated further in the attached Memorandum in Support, OMAEG has a real and substantial interest in this proceeding, which may be adversely affected by the outcome of this proceeding and which cannot be adequately represented by any existing parties. Accordingly, OMAEG satisfies the standard for intervention set forth in the Commission's rules and by statute.

WHEREFORE, OMAEG respectfully requests that the Commission grant this motion for leave to intervene and that OMAEG be made a full party of record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Bojko', written over a horizontal line.

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Counsel for the OMAEG

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MEMORANDUM IN SUPPORT

On October 3, 2014, Ohio Power Company (AEP or the Company) filed an application (Application) with the Commission seeking approval of its proposal to enter into a power purchase agreement with its affiliate, AEP Generation Resources, Inc. (AEPGR), and to include in the power purchase agreement rider (Rider PPA) under Commission consideration in Case No. 13-2385-EL-SSO, et al. (ESP Case), the net costs or benefits associated with nine generating units.

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-captioned proceeding. Section 4903.221, Revised Code, provides, in part, that any person "who may be adversely affected" by a Commission proceeding is entitled to seek intervention in that proceeding. Section 4903.221(B), Revised Code, further requires the Commission to consider the nature and extent of the prospective intervenor's interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective

intervenor will unduly prolong or delay the proceeding, and the prospective intervenor's potential contribution to a just and expeditious resolution of the issues involved.

Rule 4901-1-11, Ohio Administrative Code, permits intervention to a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede his ability to protect that interest and whose interest is not adequately represented by an existing party.

OMAEG is a non-profit entity created by the Ohio Manufacturers' Association (OMA) for the purpose of educating and providing information to its customers, regulatory boards and suppliers of energy; advancing energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and, advocating on behalf of OMA in critical cases before the Commission. OMAEG members are all members of OMA. Numerous OMA members purchase electric services from AEP. Their electric rates will be affected by the Commission's determination in this matter.

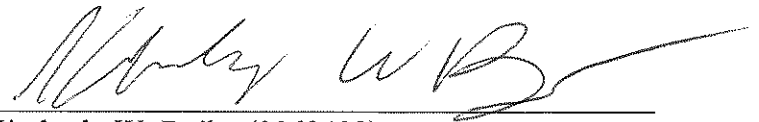
OMAEG is regularly and actively involved in Commission proceedings. With regard to this proceeding specifically, OMAEG was an active participant in the recent ESP Case, in which AEP proposed the creation of Rider PPA. OMAEG's knowledge of and unique perspective on the issues under consideration in this proceeding and their wider application for AEP customers and others will contribute to the full development and equitable resolution of the issues herein.

OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. Moreover, OMAEG's interests will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

OMAEG satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, and is, therefore, authorized to intervene with the full powers and rights granted by the Commission to intervening parties.

WHEREFORE, OMAEG respectfully requests that the Commission grant this motion for leave to intervene and that OMA be made a full party of record.

Respectfully submitted,

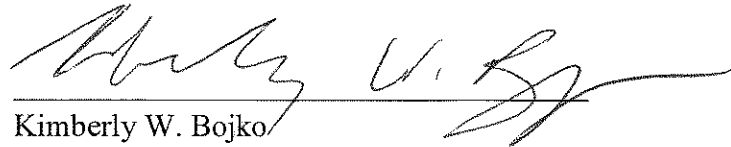
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on October 23, 2014.


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Summary: Motion To Intervene Of The Ohio Manufacturers' Association Energy Group
electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group