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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)	
FirstEnergy Corp. on Behalf of Ohio)	
Edison Company, The Cleveland)	
Electric Illuminating Company and)	Case No. 99-1212-EL-ETP
The Toledo Edison Company for)	
Approval for Their Transition Plans)	
and for Authorization to Collect)	
Transition Revenues)	
)	
and)	
)	
In the Matter of the Application of)	
FirstEnergy Corp. on Behalf of Ohio)	
Edison Company, The Cleveland Electric)	Case No. 99-1213-EL-ATA
Illuminating Company and The Toledo)	
Edison Company for Tariff Approval)	
)	
and)	
)	
In the Matter of the Application of)	
FirstEnergy Corp. on Behalf of Ohio)	
Edison Company, The Cleveland)	Case No. 99-1214-EL-AAM
Electric Illuminating Company and)	
The Toledo Edison Company for)	
Certain Accounting Authority)	

MOTION TO INTERVENE OF
COLUMBUS SOUTHERN POWER COMPANY AND OHIO POWER COMPANY

Columbus Southern Power Company (CSP) and Ohio Power Company (OPCO) (also, collectively, the "AEP Companies"), pursuant to § 4903.22.1, Ohio Rev. Code, and Rule 4901-1-11, O.A.C. hereby move to intervene in this proceeding. The reasons supporting this motion are set forth in the following Memorandum in Support.

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MEMORANDUM IN SUPPORT

As explained below, the AEP Companies have real and substantial interests in this proceeding. Disposition of this proceeding without the AEP Companies' participation may, as a practical matter, impair or impede their ability to protect their interests. No existing parties to this proceeding adequately represent the AEP Companies' interests. The AEP Companies submit that their participation will lead to a just and expeditious resolution of the issues involved in this proceeding, and their participation will not cause undue delay nor prejudice any existing party. Accordingly, the AEP Companies submit that they meet the standards for intervention provided by § 4903.22.1, Ohio Rev. Code, and Rule 4901-1-11, O.A.C.

In order to promote competition in Ohio's retail electric service markets the AEP Companies, the FirstEnergy companies, and the State's other electric utilities filed transition plans with the Commission in accordance with § 4928.31(A). Separate proceedings are going forward simultaneously before the Commission in which all of the electric utilities' transition plans are subject to review by the Staff, objection by interested parties, and ultimately approval - or modification and approval -- by the Commission.

The subjects that the electric utilities' transition plans address are in many respects the same. As a result, certain issues are common to two or more proceedings. For example, issues regarding the Alliance RTO arise in both the FirstEnergy and AEP Companies' proceedings. As another example, issues regarding Operational Support Systems, if not resolved through the task force process that the Commission has commenced, will be treated in all proceedings. Indeed, many issues regarding the interpretation and application of the provisions of Am. Sub. S.B. No. 3 and the Commission's transition plan rules are common to two or more of the transition plan proceedings. The resolution of common issues that are litigated in the other transition plan

proceedings. The resolution of common issues that are litigated in the other transition plan proceedings likely will be applied to those issues in the AEP Companies' proceeding.

Accordingly, the AEP Companies have real and substantial interests in this proceeding.

The Commission has adopted an extremely liberal intervention policy for each transition plan proceedings. Intervenor interested in the resolution of issues common to all proceedings have been granted intervention in any and all proceedings in order to participate in their resolution, whether by litigation or negotiation. Indeed, the bulk of the intervenors are the same from case to case. The Staff, of course, participates in each proceeding. As a consequence of their ability to intervene in all of the cases, intervenors in the AEP Companies' transition plan proceeding are currently litigating (and participating in settlement negotiations of) common issues in the FirstEnergy proceeding and the other electric utilities' proceedings. As a result of their ability to litigate common issues in any and all transition plan dockets, intervenors are able to address such issues and shape their resolution at the earliest possible moment and in all contexts. Absent intervention in the other proceedings, the AEP Companies will be at a distinct disadvantage in affecting outcomes for common issues. In order to protect their interest in how common issues are resolved in their own proceeding and in order to provide them with the same advantage that the intervenors enjoy, the AEP Companies must be allowed to participate in the other proceedings also. As a practical matter, disposition of this proceeding without the AEP Companies' participation may impair or impede their ability to protect their interests.

In addition, the intervenors' and Staff's settlement positions in the AEP Companies' transition plan proceedings will be informed by and perhaps, in part, be based upon, their settlement negotiations in the transition plan proceedings of the FirstEnergy companies and the other Ohio electric utilities. Accordingly, participation by the AEP Companies in the other

proceedings is appropriate so that they can participate in settlement negotiations effectively with the parties to their own transition plan proceeding.

The AEP Companies' interest in the FirstEnergy proceeding is real and substantial. Their participation will not unduly delay the FirstEnergy proceeding. Pursuant to § 4903.22.1, Ohio Rev. Code, and Rule 4901-1-11, O.A.C., the AEP Companies respectfully submit that their motion to intervene is well made and should be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene of Columbus Southern Power Company and Ohio Power Company with Memorandum in Support was served by First Class U.S. Mail upon counsel for all parties of record in this case, on this 3rd day of March, 2000.


Daniel R. Conway