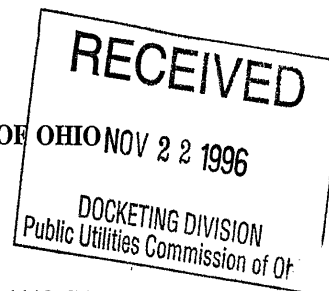


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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Application  
of Columbia Gas of Ohio, Inc. to  
Establish the Columbia Customer  
Choice Program.

:  
:  
: Case No. 96-1113-GA-ATA  
:

**MOTION OF AEP ENERGY SOLUTIONS, INC. TO INTERVENE**

AEP Energy Solutions, Inc. submits this motion, pursuant to § 4909-1-11, Ohio Admin. Code, seeking authority of the Public Utilities Commission of Ohio (Commission) to intervene in this proceeding. As shown in the memorandum supporting this motion, AEP Energy Solutions has a real and substantial interest in this proceeding and its intervention should be permitted pursuant to § 4909-1-11(B), Ohio Admin. Code.

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

AEP Energy Solutions, Inc is an Ohio corporation and is a non-utility subsidiary of American Electric Power Company, Inc. It has been formed pursuant to authorization of the Securities and Exchange Commission under the Public Utility Holding Company Act of 1935. Among other activities, AEP Energy Solutions is authorized to broker and market natural gas to end-use customers.

By this application, Columbia Gas of Ohio, Inc. (Columbia) proposes to establish the Columbia Customer Choice Program (Program) and make transportation service available to residential, small commercial and commercial human needs customers. Columbia proposes to solicit the participation of natural gas marketers to act as the suppliers of natural gas to individuals who elect to participate in the Program. Columbia and the marketers will enter into

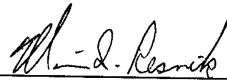
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aggregation service agreements which, among other things, would obligate the marketers to comply with all provisions of the Program.

As a potential supplier under the Program, AEP Energy Solutions clearly has an interest in this proceeding. That interest is not being represented by any existing party or other petitioner for intervention. Further, since AEP Energy Solutions brings to this proceeding the perspective of a potential supplier, its intervention will contribute to a just and expeditious resolution of the issues involved in this proceeding and will not unduly delay the proceeding or unjustly prejudice any existing party.

Therefore, AEP Energy Solutions respectfully requests that the Commission grant this motion and permit its intervention in this proceeding.

Respectfully submitted,

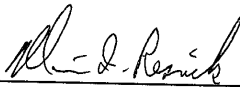


Marvin I. Resnik  
American Electric Power  
Service Corporation  
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(614) 223-1608

Counsel for AEP Energy Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion of AEP Energy Solutions, Inc. to Intervene has been served upon the following parties listed below by hand-delivery, fax or regular U.S. mail, postage prepaid, this 22nd day of November, 1996.

  
Marvin I. Resnik

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