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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Cincinnati Gas & Electric For Approval of Electric Transition Plan))))	Case No. 99-1658-EL-ETP
In the Matter of the Application of Cincinnati Gas & Electric Application For Tariff Approval))))	Case No. 99-1659-EL-ATA
In the Matter of the Application of Cincinnati Gas & Electric Application For Tariff Approval))))	Case No. 99-1660-EL-ATA
In the Matter of the Application of Cincinnati Gas & Electric For Approval to Change Accounting Methods))))	Case No. 99-1661-EL-AAM
In the Matter of the Application of Cincinnati Gas & Electric For Approval to Change Accounting Methods))))	Case No. 99-1662-EL-AAM
In the Matter of the Application of Cincinnati Gas & Electric Unclassified))))	Case No. 99-1663-EL-UNC

MOTION TO INTERVENE OF MID-ATLANTIC
POWER SUPPLY ASSOCIATION

Pursuant to Ohio Revised Code ("R.C.") Section 4903.22.1 and Ohio Administrative Code ("OAC") Rule 4901-1-11, Mid-Atlantic Power Supply Association ("MAPSA"), hereby moves to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant MAPSA leave to intervene because MAPSA has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect MAPSA's ability to protect its interests. Reasons which support MAPSA's Motion are addressed below.

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MEMORANDUM IN SUPPORT

MAPSA is a trade association of power marketers, independent power producers, and various companies who support the electric services industry within the Mid-Atlantic marketplace, each of whom seeks to develop a more competitive power industry. MAPSA has made a significant investment in the legislative, individual utility company restructuring, and commission rules' promulgation processes in Pennsylvania, New Jersey, Maryland, and Delaware. Most members are licensed to sell wholesale or retail electric energy in the competitive retail markets of some or all of the aforementioned states. MAPSA has a compelling interest in the development of a robust competitive electric market in the Cincinnati Gas & Electric Company service area in which MAPSA plans to participate. MAPSA has business interests and business plans which are unique to it in entering and competing in the service area of Cincinnati Gas & Electric. Issues relevant to MAPSA's interests will be determined in this matter and no other party to this proceeding would adequately represent MAPSA's unique interests. Therefore, it is vital to those interests that MAPSA be permitted to intervene.

WHEREFORE Mid-Atlantic Power Supply Association moves the Commission to grant its Motion to Intervene.

Respectfully submitted on behalf of
MID-ATLANTIC POWER SUPPLY ASSOCIATION

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion to Intervene of
Mid-Atlantic Power Supply Association was served upon the parties listed on the attached
Service List by regular U.S. Mail, postage prepaid, this 31st day of January, 2000.

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