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SEC

STAND ENERGY CORPORATION

1077 Celestial Street • Rookwood Bldg. • Suite 110
Cincinnati, Ohio 45202
(613) 621-1113

January 17, 2000

The Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43266-0573

Re: Case No. 99-1658-EL-ETP
Case No. 99-1659-EL-ATA
Case No. 99-1660-EL-ATA
Case No. 99-1661-EL-AAM
Case No. 99-1662-EL-AAM
Case No. 99-1663-EL-UNC

RECEIVED DOCKETING DIV
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PUCO

Gentlemen:

Pursuant to Ohio Administrative Code §4901-1-02(C), enclosed please find an original and fifteen copies of Stand Energy Corporation's Motion to Intervene in the above styled proceedings. Also included is an extra copy of this motion. Please date stamp this copy and return it to me in the enclosed self addressed envelope.

Sincerely,

Jerry Borchert

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Andree Smith Date Processed 1/21/00

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO RECEIVED MARKETING DIV

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PUCO

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Approval Of Its Electric For Authorization To Collect Transition Revenues) Case No. 99-1658-EL-ETP

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Approval Of Tariff Changes Required To Implement Retail Electric Competition) Case No. 99-1659-EL-ATA

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Approval Of Its New Tariffs) Case No. 99-1660-EL-ATA

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Authority To Modify Current Accounting Procedures To Defer Costs Incurred Arising From The Implementation Of Its Electric Transition Plan.) Case No. 99-1661-EL-AAM

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Authority To Modify Current Accounting Procedures To Continue To Defer The Unrecovered Balance Of Regulatory Assets.) Case No. 99-1662-EL-AAM

In The Matter Of The Application Of The Cincinnati Gas & Electric Company For Approval To Transfer Its Generating Assets To An Exempt Wholesale Generator.) Case No. 99-1663-EL-UNC

Motion to Intervene of Stand Energy Corporation

Pursuant to Rule 4901-1-11 of the Ohio Administrative Code, Stand Energy Corporation requests that it be granted leave to intervene in the above proceedings. The basis for this motion is set forth in the accompanying Memorandum of Support.

Respectfully submitted,

 1/17/00

Judith A. Phillips
President
Stand Energy Corporation
1077 Celestial St., Suite 110
Cincinnati, Ohio 45202
Telephone (513) 621-1113
Facsimile (513) 621-3773

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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**Memorandum in Support of
Motion to Intervene of Stand Energy Corporation**

Stand Energy Corporation is a marketer of natural gas and wholesale electricity in the State of Ohio. It is a Certified Electricity Supplier in the State of New York and fully intends to become a Certified Provider of Energy Services in the State of Ohio. Consequently, Stand Energy Corporation has a strong interest in and will be materially affected by the outcome of these proceedings.

Since the supply of electricity in Ohio will be a competitive market, and many of the parties participating in these proceedings are potential competitors, clearly Stand Energy Corporation's interests will not be adequately represented, and may be harmed, unless it is allowed to participate.

For these reasons, Stand Energy Corporation respectfully requests that it be granted leave to intervene in these proceedings.

Respectfully submitted,

Judith A. Phillips 1/17/00

Judith A. Phillips
President
Stand Energy Corporation
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Cincinnati, Ohio 45202
Telephone (513) 621-1113
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CERTIFICATE OF SERVICE

I herby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support of Stand Energy Corporation was sent by First Class U.S. Mail to all parties of record this 17th day of January, 2000.

 1/17/00
Judith A. Phillips