Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Establish ) Case No. 12-3255-EL-RDR

Initial Storm Damage Recovery )

Rider Rates )

**Industrial Energy Users-Ohio’s**

**Motion to Intervene and Memorandum in Support**

Samuel C. Randazzo (Counsel of Record)

Frank P. Darr

Joseph E. Oliker

Matthew R. Pritchard

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

joliker@mwncmh.com

mpritchard@mwncmh.com

February 1, 2013 Attorneys for Industrial Energy Users-Ohio

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**Motion to Intervene**

Industrial Energy Users-Ohio (“IEU-Ohio”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On December 21, 2012, Ohio Power Company (“AEP-Ohio”) filed an application to establish initial storm damage recovery rider rates. AEP-Ohio’s application, if approved, will impact the ultimate price of electricity charged to IEU-Ohio members.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo (Counsel of Record)

Frank P. Darr

Matthew R. Pritchard

Joseph E. Oliker

McNees Wallace & Nurick LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

[joliker@mwncmh.com](mailto:joliker@mwncmh.com)

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**Memorandum in Support**

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member\_list.aspx. IEU-Ohio’s members purchase substantial amounts of electric and related services from Ohio’s Electric Distribution Utilities (“EDU”) and AEP-Ohio in particular.

IEU-Ohio’s members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to Amended Substitute Senate Bill 221 (“SB 221”), and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members’ manufacturing facilities. Specifically, IEU-Ohio’s direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo (Counsel of Record)

Frank P. Darr

Matthew R. Pritchard

Joseph E. Oliker

McNees Wallace & Nurick LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

[joliker@mwncmh.com](mailto:joliker@mwncmh.com)

**Attorneys for Industrial Energy Users-Ohio**

#### Certificate of Service

I hereby certify that a copy of the foregoing *Industrial Energy Users-Ohio’s Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 1st day of February 2013, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

/s/ Matthew R. Pritchard

Matthew R. Pritchard

Steven T. Nourse

Matthew J. Satterwhite

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

stnourse@aep.com

mjsatterwhite@aep.com

**On Behalf of Ohio Power Company**

David F. Boehm

Michael L. Kurtz

Jody Kyler Cohn

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, OH 45202

[dboehm@BKLlawfirm.com](mailto:dboehm@BKLlawfirm.com)

[mkurtz@BKLlawfirm.com](mailto:mkurtz@BKLlawfirm.com)

[jkyler@BKLlawfirm.com](mailto:jkyler@BKLlawfirm.com)

**On Behalf of the Ohio Energy Group**

Terry L. Etter, Counsel of Record

Michael J. Schuler

Associate Consumers’ Counsel

Office of the Ohio Consumers’ Counsel

10 W. Broad Street, 18th Floor

Columbus, OH 43215-3485

etter@occ.state.oh.us

schuler@occ.state.oh.us

**On Behalf of the Office of the Ohio**

**Consumers’ Counsel**

Mark S. Yurick

Zachary D. Kravitz

Taft Stettinius & Hollister

65 East State Street, Suite 1000

Columbus, OH 43215

myurick@taftlaw.com

zkravitz@taftlaw.com

**On Behalf of The Kroger Co.**

Werner Margard

Ryan O’Rourke

Assistant Attorneys General

Public Utilities Section

180 E. Broad Street, 6th Floor

Columbus, OH 43215-3793

[werner.margard@puc.state.oh.us](mailto:werner.margard@puc.state.oh.us)

rorourke@puc.state.oh.us

**On Behalf of the Staff of the Public Utilities Commission of Ohio**

Sarah Parrott

Jonathan Tauber

Attorney Examiners

Public Utilities Commission of Ohio

180 E. Broad Street, 12th Floor

Columbus, OH 43215-3793

Sarah.Parrot@puc.state.oh.us

[jonathan.tauber@puc.state.oh.us](mailto:jonathan.tauber@puc.state.oh.us)

**Attorney Examiners**