Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Update Its ) Case No. 12-1046-EL-RDR

Transmission Cost Recovery Rider. )

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

June 29, 2012 Attorneys for Industrial Energy Users-Ohio

Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Update Its ) Case No. 12-1046-EL-RDR

Transmission Cost Recovery Rider. )

Industrial Energy Users-Ohio’s

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 (“O.A.C.”), 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 June 15, 2012, Ohio Power Company (“OP” or “AEP-Ohio”) filed an application to update their Transmission Cost Recovery Rider (“TCRR”) in the above-referenced matter. As part of its application, OP proposed to increase the rates under the TCRR. OP states that, on average, its application will increase TCRR rates by 28.17%.[[1]](#footnote-1)

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

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

 Attorneys for Industrial Energy Users-Ohio

Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Update Its ) Case No. 12-1046-EL-RDR

Transmission Cost Recovery Rider. )

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”).

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 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

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

 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 29nd day of June 2012, *via* hand-delivery, electronic transmission, or first class mail, U.S. postage prepaid.

 /s/ Matthew R. Pritchard

 Matthew R. Pritchard

Steven T. Nourse

Yazen Alami

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215-2373

stnourse@aep.com

yalami@aep.com

**Counsel for Ohio Power Company**

William Wright

Assistant Attorney General

Chief, Public Utilities Section

180 E. Broad Street, 6th Floor

Columbus, OH 43215-3793

william.wright@puc.state.oh.us

**Counsel for the Staff of the Public**

**Utilities Commission of Ohio**

1. Application at 4 (June 15, 2012). [↑](#footnote-ref-1)