Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Adopt a ) Case No. 14-1186-EL-RDR

Final Implementation Plan for the )

Retail Stability Rider )

# Motion to Intervene and Memorandum In Support

# of Industrial Energy Users-Ohio

 Samuel C. Randazzo

 (Counsel of Record) (Reg. No. 0016386)

Frank P. Darr (Reg. No. 0025469)

Matthew R. Pritchard (Reg. No. 0088070)

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

(willing to accept service by e-mail)

fdarr@mwncmh.com

(willing to accept service by e-mail)

mpritchard@mwncmh.com

(willing to accept service by e-mail)

July 18, 2014 Attorneys for Industrial Energy Users-Ohio

Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Adopt a ) Case No. 14-1186-EL-RDR

Final Implementation Plan for the )

Retail Stability Rider )

# Motion to Intervene of Industrial Energy Users-Ohio

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 July 8, 2014, Ohio Power Company (“AEP-Ohio”) submitted its application for approval to adopt a final implementation plan for its Retail Stability Rider. 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/ Frank P. Darr

 Samuel C. Randazzo

 (Counsel of Record) (Reg. No. 0016386)

Frank P. Darr (Reg. No. 0025469)

Matthew R. Pritchard (Reg. No. 0088070)

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

(willing to accept service by e-mail)

fdarr@mwncmh.com

(willing to accept service by e-mail)

mpritchard@mwncmh.com

(willing to accept service by e-mail)

 Attorneys for Industrial Energy Users-Ohio

Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of )

Ohio Power Company to Adopt a ) Case No. 14-1186-EL-RDR

Final Implementation Plan for the )

Retail Stability 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”) including AEP-Ohio.

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 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 to IEU-Ohio members’ facilities.

 Respectfully submitted,

 /s/ Frank P. Darr

 Samuel C. Randazzo

 (Counsel of Record) (Reg. No. 0016386)

Frank P. Darr (Reg. No. 0025469)

Matthew R. Pritchard (Reg. No. 0088070)

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

(willing to accept service by e-mail)

fdarr@mwncmh.com

(willing to accept service by e-mail)

mpritchard@mwncmh.com

(willing to accept service by e-mail)

 Attorneys for Industrial Energy Users-Ohio

**Certificate of Service**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 18th day of July 2014, *via* electronic transmission.

/s/ Frank P. Darr

Frank P. Darr

Steven T. Nourse (Reg. No. 0046705)

Matthew J. Satterwhite (Reg. No. 0071972)

American Electric Power Service Corporation

1 Riverside Plaa, 29th Floor

Columbus, OH 43215

stnourse@aep.com

mjsatterwhite@aep.com

**Attorneys for Ohio Power Company**

David F. Boehm (Reg. No. 0021881)

Michael L. Kurtz (Reg. No. 0033350)

Jody Kyler Cohn (Reg. No. 0085402)

Boehm, Kurtz & Lowry

36 E. Seventh St., Suite 1510

Cincinnati, OH 45202

dboehm@BKLlawfirm.com

mkurtz@BKLlawfirm.com

jkyler@BKLlawfirm.com

**Attorneys for the Ohio Energy Group**

Richard L. Sites (Reg. No. 0019887)

General Counsel & Senior Director of Health Policy

Ohio Hospital Association

155 East Broad Street, 15th Floor

Columbus, OH 43215-3620

ricks@ohanet.org

Thomas J. O’Brien (Reg. No. 0066249)

Bricker & Eckler LLP

100 South Third Street

Columbus, OH 43215-4291

tobrien@bricker.com

**Attorneys for the Ohio Hospital Association**

William Wright (Reg. No. 0018010)

Chief, Public Utilities Section

Ohio Attorney General

180 East Broad Street, 6th Floor

Columbus, OH 43215-3793

william.wright@puc.state.oh.us

**Attorney for the Staff of the Public Utilities Commission of Ohio**

Sarah Parrot (Reg. No. 0082197)

Greta See

Attorney Examiners

Public Utilities Commission of Ohio

180 East Broad Street

Columbus, OH 43215

Greta.See@puc.state.oh.us

sarah.parrot@puc.state.oh.us

**Attorney Examiners**