

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of Conjunctive Electric Service)
Guidelines, Proposed by Participants of the)
Commission Roundtable on Competition)
in the Electric Industry)
Monongahela Power Company's)

Case No. 96-406-EL-COI

**MOTION OF PANENERGY TRADING AND MARKET SERVICES, L.L.C.
FOR LEAVE TO INTERVENE**

This Motion for Leave to Intervene is filed by PanEnergy Trading and Market Services, L.L.C. (PTMS) pursuant to Rule 4901-1-11 of the Public Utility Commission of Ohio's (Commission) Rules of Practice. PTMS requests that this Motion be granted for the reasons set forth below:

I.

Communications and correspondence concerning this Motion should be directed to the following:

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II.

PTMS is a wholly-owned subsidiary of PanEnergy Natural Gas Corporation and is an independent power marketer. PTMS — which received authorization from the Commission on October 2, 1996 to sell electricity at market-based rates¹ — markets electric power and provides value-added

¹ PanEnergy Trading and Market Services, L.L.C., Docket No. ER96-2921-000, Letter Order dated October 2, 1996.

services for utility and non-utility generators. PTMS has a significant interest in the customers in Monongahela Power Company's (Monongahela) service territory, as well as the Ohio electricity market in general.

III.

On March 31, 1997, Monongahela, actually doing business as Allegheny Power (Allegheny), filed an Application for approval of its Experimental Conjunctive Electric Service Schedule. The Experimental Conjunctive Electric Service Schedule is a two-year pilot program intended to comply with the Order of the Commission in Case No. 96-406-EL-COI. Under Conjunctive Electric Service, different customer service locations will be aggregated for billing purposes.

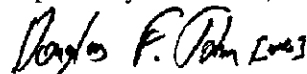
IV.

As a potential recipient or beneficiary of transmission service from Monongahela, as well as a participant of Monongahela's experimental pilot program, PTMS will be directly affected by the outcome of this proceeding. PTMS' interests cannot be adequately represented or protected by any other participant. Under the circumstances, good cause thus exists to permit PTMS to intervene.

V.

WHEREFORE, for the reasons set forth above, PTMS respectfully requests that the Commission permit PTMS to intervene in the above-captioned proceeding and be made a party for all purposes.

Respectfully submitted,



Douglas F. John, Esq.

Gordon J. Smith, Esq.

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Counsel For PanEnergy Trading and Market
Services, L.L.C.

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C.: April 30, 1997.

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