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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

2008 AUG 28 AM 11:08

PUCO

In the Matter of the Application of :  
Columbus Southern Power Company for :  
Approval of its Electric Security Plan; an : Case No. 08-917-EL-SSO  
Amendment to its Corporate Separation :  
Plan; and the Sale or Transfer of Certain :  
Generation Assets. :

In the Matter of the Application of Ohio :  
Power Company for Approval of its : Case No. 08-0918-EL-SSO  
Electric Security Plan; and an Amendment :  
To its Corporate Separation Plan. :

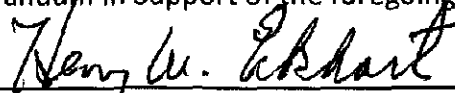
## MOTION TO INTERVENE

BY

THE NATURAL RESOURCES DEFENSE COUNCIL

The Natural Resources Defense Council ("NRDC") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in both of the above styled cases pursuant to Sec. 4903.221 Revised Code of Ohio, and Rule 4901-1-11, of the Ohio Administrative Code, with full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The NRDC provides the following Memorandum In Support of the foregoing Motion.

  
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## MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene The Natural Resources Defense Council ("NRDC") states that it is a non-profit environmental organization with over 30 years experience working on state energy policy, including utility regulation and energy efficiency. NRDC has a strong historical interest in ensuring that Ohio adopts environmentally sound and sustainable energy policies.

NRDC and its 12,600 members who live in Ohio are interested in promoting greater reliance on energy efficiency and renewable energy to meet Ohio's energy needs.

NRDC seeks to intervene in this proceeding in order that its members' interests in promoting energy efficiency and renewable energy resources are represented.

NRDC will bring significant expertise to bear in these proceedings. The Staff of NRDC and the witnesses it proposes to introduce have extensive history with the design and implementation of utilities programs and policies designed to deploy energy efficiency and renewable energy technologies to benefit the public.

NRDC has intervened and/or provided testimony on these issues in similar proceedings in a number of States including Illinois, Wisconsin, New York, Oregon, California, New Jersey, and Iowa, to name a few.

NRDC regularly presents testimony before Congress and various state legislatures related to the electric utility industry use of energy efficiency and renewable energy resources, utility rate design, utility planning and other topics relevant in this proceeding.

Many of the NRDC members are served by the Columbus Southern Power Company and Ohio Power Company that are the Applicants in this case. The NRDC has a real and substantial

interest as these proceedings may directly or indirectly impact the environment of the State of Ohio, and other areas of the United States, and the electric bills of its members in Applicant's service area.

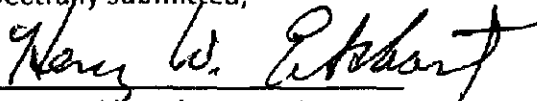
Intervention of NRDC will not unduly prolong or delay the proceedings.

Intervention of NRDC will significantly contribute to full development of the record in this case.

NRDC's particular interest is in regard to environmental issues and the developing of the Applicant's resource strategy which will not be fully represented by other existing parties.

WHEREFORE, The Natural Resources Defense Council respectfully requests that its Motion To Intervene be in full as aforesaid.

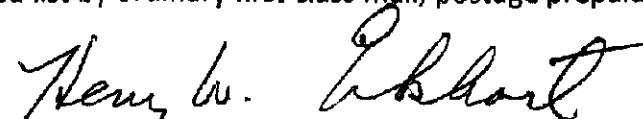
Respectfully submitted,



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CERTIFICATE OF SERVICE

The Undersigned hereby certifies that he has served a copy of the foregoing Motion to Intervene upon the parties on the attached list by ordinary first class mail, postage prepaid, this 28<sup>th</sup> day of August, 2008.

  
Henry W. Eckhart

CASE NUMBER: 08-0917-EL-SSO  
CASE DESCRIPTION: COLUMBUS SOUTHERN POWER  
DOCUMENT SIGNED 8/28/2008  
ON:  
DATE OF SERVICE: \_\_\_\_\_

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