

**FILE**

**BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255  
TELECOPIER (513) 421-2764

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January 16, 2009

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

**In re: Case No. 08-1338-EL-AAM and 08-1339-EL-UNC**

Dear Sir/Madam:

Please find enclosed an original and twelve (12) copies of the OHIO ENERGY GROUP'S MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT to be filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

DFBkew  
Encl.

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**CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by electronic mail (when available) and regular mail, this 16<sup>th</sup> day of January, 2009 to the following:



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

COLUMBUS SOUTHERN POWER  
SELWYN J. R. DIAS  
SUITE 800 88 E. BROAD STREET  
COLUMBUS OH 43215

RII, ETHAN E  
SONNENSCHN NATH & ROSENTHAL  
1301 K STREET NW SUITE 600 EAST TOWER  
WASHINGTON DC 20005

SATTERWHITE, MATTHEW J.  
1 RIVERSIDE PLAZA  
COLUMBUS OH 43215

OHIO CONSUMERS' COUNSEL  
10 W. BROAD STREET SUITE 1800  
COLUMBUS OH 43215-3485

NOURSE, STEVEN T SENIOR COUNSEL  
AMERICAN ELECTRIC POWER COMPANY  
1 RIVERSIDE PLAZA  
COLUMBUS OH 43215

RESNIK, MARVIN  
AMERICAN ELECTRIC POWER CORP.  
1 RIVERSIDE PLAZA, 29TH FLOOR  
COLUMBUS OH 43215

GRADY, MAUREEN  
OFFICE OF CONSUMERS' COUNSEL  
10 W. BROAD STREET SUITE 1800  
COLUMBUS OH 43215-3485



**BEFORE THE  
PUBLIC UTILITY COMMISSION OF Ohio**

In the Matter of the Joint Application of Columbus Southern Power Company and Ohio Power Company for Authority to Modify their Accounting Procedures.	: : : : : :	<b>Case No. 08-1338-EL-AAM</b>
In the Matter of the Joint Application of Columbus Southern Power Company and Ohio Power Company and Ormet Primary Aluminum Mill Products Corporation for Approval of a Temporary Amendment to their Special Arrangement.	: : : : : :	<b>Case No. 08-1339-EL-UNC</b>

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**MEMORANDUM IN SUPPORT OF  
THE OHIO ENERGY GROUP'S  
MOTION TO INTERVENE**

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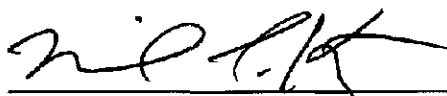
Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Aleris International, Inc., BP-Husky Refining, LLC, Brush Wellman, E.I. dupont de Nemours & Company, Ford Motor Company, GE Aviation, Griffin Wheel, Linde, Inc., Procter & Gamble Distribution Company, PPG Industries, Inc., Republic Engineered Products, Inc., Severstal Wheeling and Worthington Industries. These companies purchase large amounts of electric power services from Columbus Southern Power. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



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David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)

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

January 16, 2009

**COUNSEL FOR THE OHIO ENERGY GROUP**