

FILE

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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,



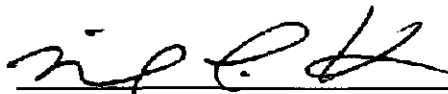
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Encl.

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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:



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**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

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

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**MOTION TO INTERVENTION OF THE  
THE OHIO ENERGY GROUP**

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Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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January 16, 2009

**COUNSEL FOR THE OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF Ohio**

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

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

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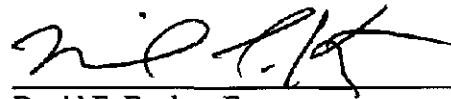
Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

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,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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January 16, 2009

**COUNSEL FOR THE OHIO ENERGY GROUP**