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PUCO

Via Overnight Mail

July 17, 2009

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

In re: Case No. 09-578-EL-EEC and 09-579-EL-EEC

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT filed today 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

MLKkew

Encl.

Cc: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 17th day of July, 2009 the following:

A handwritten signature in black ink, appearing to read "David F. Boehm", is written over a horizontal line.

David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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COLUMBUS OH 43215

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of: The Application of Columbus : **Case No. 09-578-EL-EEC**
Southern Power Company for approval of its peak :
demand reduction program portfolio plan and request :
for waiver and request for amendment of the 2009 :
peak demand reduction benchmark pursuant to section :
4928.66(A)(2)(b), Ohio Revised Code. :

In The Matter Of: The Application of Ohio Power : **Case No. 09-579-EL-EEC**
Company for approval of its peak demand reduction :
program portfolio plan and request for waiver and :
request for amendment of the 2009 peak demand :
reduction benchmark pursuant to section :
4928.66(A)(2)(b), Ohio Revised Code. :

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

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.
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July 17, 2009

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF Ohio**

In The Matter Of: The Application of Columbus	:	Case No. 09-578-EL-EEC
Southern Power Company for approval of its peak	:	
demand reduction program portfolio plan and request	:	
for waiver and request for amendment of the 2009	:	
peak demand reduction benchmark pursuant to section	:	
4928.66(A)(2)(b), Ohio Revised Code.	:	

In The Matter Of: The Application of Ohio Power	:	Case No. 09-579-EL-EEC
Company for approval of its peak demand reduction	:	
program portfolio plan and request for waiver and	:	
request for amendment of the 2009 peak demand	:	
reduction benchmark pursuant to section	:	
4928.66(A)(2)(b), Ohio Revised Code.	:	

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

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: Aleris International, Inc., Amsted Raid Company, Inc., AK Steel Corporation, ArcelorMittal, USA, BP-Husky Refining, LLC, E.I. DuPont de Nemours & Company, Ford Motor Company, GE Aviation, Procter & Gamble Co., Linde, Inc., 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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July 17, 2009

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