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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus)
Southern Power Company for Amendment of the)
2009 Solar Energy Resource Benchmark, Pursuant)
to Section 4928.64(C)(4), Ohio Revised)
Code.)

Case No. 09-987-EL-EEC

In the Matter of the Application of Ohio Power)
Company for Amendment of the 2009 Solar)
Energy Resource Benchmark, Pursuant to Section)
4928.64(C)(4), Ohio Revised Code.)

Case No. 09-988-EL-EEC

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**MOTION TO INTERVENE
OF
OHIO ADVANCED ENERGY**

Ohio Advanced Energy ("OAE") moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, OAE submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without the participation of OAE may impair or impede their ability to protect that interest, and that their participation in these proceedings will contribute to a just result. OAE further submits that no existing party represents its interest in these proceedings and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

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MEMORANDUM IN SUPPORT

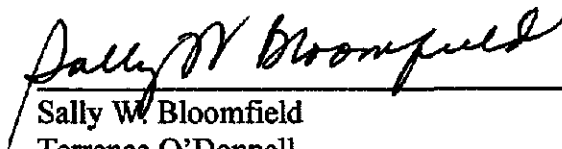
OAE is the premier Ohio-based business trade association advocating on behalf of advanced and renewable technology industries. Comprised of 30 companies and organizations working in the areas of solar power, wind power, and other advanced energy technologies, OAE advocated extensively in the General Assembly for the alternative energy portfolio standard in Amended Substitute Senate Bill ("S.B.") 221 and is working to implement a coherent economic growth strategy for Ohio centered on advanced and renewable energy consistent with the principles set forth in S.B. 221. OAE participated in the rule making proceeding, Case No. 08-888-EL-ORD, providing comments on the solar energy resources benchmarks ("SER benchmarks"). The members of OAE are suppliers of alternative energy sources, potentially to Ohio electric utilities, and as such they have a real and substantial interest in these applications especially as they pertain to the Applicant's proposals to secure alternative energy resources as well as an interest in other issues in these proceedings. In particular, OAE believes that the Commission should take into consideration additional information concerning AEP Ohio's assertions that it has made good faith attempts to comply with the minimum benchmarks for 2009. OAE disputes AEP's assertions of good faith with respect to meeting the SER benchmarks.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, OAE members are real parties in interest in these proceedings. OAE submits that its interest is not represented by existing parties and thus their interests are not now represented. OEA can make a contribution to these proceedings and because the proceedings are in the early stage with Commission action with respect to process not yet determined, OAE's participation will not unduly delay these proceedings or prejudice any existing party. In addition, OAE has been

working collaboratively with other advanced energy entities and expects that in the future, others may join its motion to intervene. In the interest of administrative economy in these proceedings, OAE requests that the Commission permit others to join with OAE to intervene. By granting OAE's motion to intervene, the Commission will permit OAE to contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings. Furthermore, OEA's participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, Ohio Advanced Energy respectfully requests that its motion to intervene in the above-captioned proceedings be granted and that the Commission permit others to join OAE's motion to intervene at a later date.

Respectfully submitted on behalf of
OHIO ADVANCED ENERGY



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 23rd day of November 2009 *via* regular mail.


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