

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Application of Columbus Southern Power Company for Approval of its Program Portfolio Plan and Request for Expedited Treatment Consideration.	)	Case No. 09-1089-FOR
In the Matter of the Application of Ohio Power Company for Approval of its Program Portfolio Plan and Request for Expedited Treatment Consideration.	)	Case No. 09-1090-FOR

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**MOTION TO INTERVENE OF THE OHIO MANUFACTURERS' ASSOCIATION**

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Pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the Ohio Manufacturers' Association ("OMA") moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio ("Commission") should grant OMA leave to intervene because OMA has a real and substantial interest in these proceedings, and the Commission's disposition of these proceedings may impair or impede OMA's ability to protect that interest.

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**MEMORANDUM IN SUPPORT**

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The Ohio Manufacturers' Association ("OMA") should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests. OMA was actively involved in the legislative process that resulted in enactment of Senate Bill 221, and was granted intervention in the prior standard service offering ("SSO") proceeding filed by Columbus Southern Power Company and Ohio Power Company (collectively "AEP Companies").

OMA is the only statewide association exclusively serving manufacturers. It has more than 1,600 Ohio manufacturing companies as members. OMA's member companies consume medium to large amounts of electrical energy and must rely on their host electric distribution utilities of the AEP Companies, to deliver the electric power necessary in their operations.

OMA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceedings could have a substantial effect on the electricity costs of OMA members, including those OMA members in the service area of the AEP Companies.

Consistent with the requirements of R.C. Section 4903.221, and OAC Rule 4901-1-11(B), OMA is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding or prejudice any existing party. OMA submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

OMA has a substantial interest in these proceeding that is not adequately addressed by any other party. OMA's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

Accordingly, OMA respectfully requests the Commission to determine that OMA has a real and substantial interest in these proceedings and should grant its Motion to Intervene pursuant to R.C. Section 4903.221 and OAC Rule 4901-1-11.

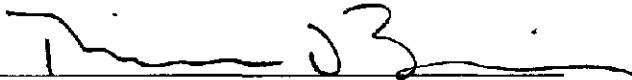
Respectfully submitted on behalf of  
OHIO MANUFACTURERS' ASSOCIATION



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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 8<sup>th</sup> day of December 2009 *via* first class mail.

  
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