

FILE

BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Columbus Southern Power Company for )  
Amendments of the 2009 Solar Energy )  
Reserve Benchmark, Pursuant to )  
Section 4928. (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.(C)(4), Ohio Revised Code. )

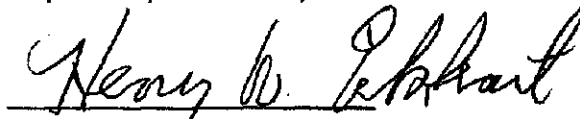
Case No. 09-988-EL-EEC

MOTION TO INTERVENE BY  
THE SIERRA CLUB, OHIO CHAPTER

The Sierra Club, Ohio Chapter ("Sierra Club") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in both of the above styled cases pursuant to Sec. 4903.221 Revised Code of Ohio, and Rule 4901-1-11, of the Ohio Administrative Code, with full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The Sierra Club provides the following Memorandum In Support of the foregoing Motion.

Respectfully submitted;



Henry W. Eckhart (Counsel of Record)

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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene, The Sierra Club states that it is the world's oldest and largest grassroots environmental organization. It has 1.4 million members and supporters in 65 Chapters and over 400 local groups nationwide.

The Sierra Club's statement of purpose is "To explore, enjoy and protect the wild places of the Earth, to practice and promote the responsible use of the Earth's ecosystem and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives." The Sierra Club had been involved in promotion of a responsible energy policy almost since its first year.

The Sierra Club's Ohio Chapter has over 17,000 members throughout the state. Global Warming is the Sierra Club's highest priority issue. The Club's Ohio Chapter has been actively promoting energy efficiency as the lowest cost and most environmentally acceptable resource since 1984.

The Sierra Club has been involved in approximately 25 separate cases before the Commission during the decades of the 1990's and 2000's involving all of the 7 major electric IOU's in Ohio. The Ohio Chapter was a key proponent of the energy efficiency measures in Sub. S. B. 221.

Many of The Sierra Club's Ohio members are served by the electric utility companies that are Applicants in this case. The Sierra Club has a real and substantial interest as these

proceedings may directly or indirectly impact the environment of the State of Ohio, and other areas of the United States, and the electric bills of our members in the Applicants service areas.

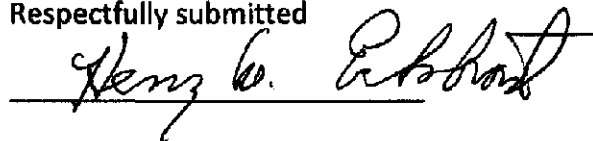
Intervention of The Sierra Club will not unduly prolong or delay the proceedings.

The Intervention of The Sierra Club will significantly contribute to full development of the record in the case.

The Sierra Club's particular interest regarding environmental issues and the development of the Applicants resource strategy will not be fully represented by other existing parties.

WHEREFORE, the Sierra Club of Ohio respectfully requests that its Motion to Intervene be granted in full as aforesaid.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Henry W. Eckhart", is written over a horizontal line.

Henry W. Eckhart (0020202)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has served a copy of the foregoing Motion and Memorandum upon the persons listed below by e-mail or regular U. S mail, postage prepaid, this 18<sup>th</sup> day of December, 2009.

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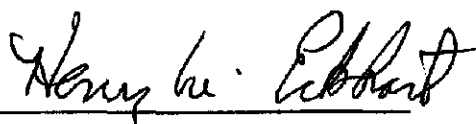
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