

Fax: (614) 221-7401 E-mail:
henryeckhart@aol.com

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.

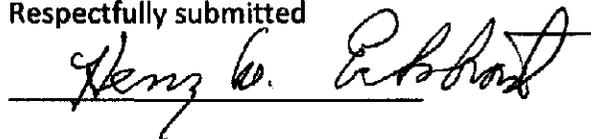
Intervention of The Sierra Club will not unduly prolong or delay the proceedings.

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, reading "Henry W. Eckhart", is written over a horizontal line.

Henry W. Eckhart (0020202)

Attorney for The Sierra Club Ohio Chapter

50 West Broad Street #2117

Columbus Ohio 43215

Phone: (614) 461-0984

Fax: (614) 221-7401

E-mail: henryeckhart@agl.com

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 18th day of December, 2009.

Steven T. Nourse
Marvin I. Resnik
American Electric Power Service Corp.
1 Riverside Plaza, 29th Floor
Columbus OH 43215

Todd M. Williams
P O Box 6885
Toledo OH 43612

Will Reisinger
Ohio Environmental Council
1207 Grandview Avenue
Columbus OH 43212

David Rinebolt
231 West Lima Street
P O Box 1793
Findlay OH 45839-1793

Joe Clark
McNees Wallace & Nurick LLC
21 East State Street, 17th floor
Columbus Oh 43215

Terrence O'Donnell
Bricker & Eckler
100 South Third Street
Columbus OH 43215

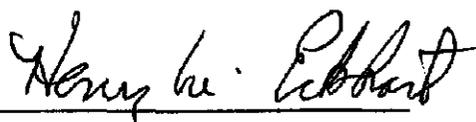
Michael E. Heintz
1207 Grandview Avenue
Columbus OH 43212

Sally Bloomfield
Bricker & Eckler
100 South Third Street
Columbus Oh 43215-4291

Terry Etter
Ohio Consumers' Counsel
10 West Broad Street
Columbus Oh 43215

David Boehm
Boehm Kurtz & Lowery
36 East Seventh Street #1510
Cincinnati OH 45202-4454

Colleen L. Mooney
1431 Mulford Road
Columbus Oh 43212


Henry W. Eckhart