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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Columbus Southern)
Power Company and Ohio Power Company for)
Administration of the Significantly Excessive Earnings Test) Case No. 10-1261-EL-UNC
Under Section 4928.143(F), Revised Code, and Rule)
4901:1-35-10, Ohio Administrative Code.)

PUCO

MOTION TO INTERVENE OF THE OHIO MANUFACTURERS' ASSOCIATION

Pursuant to Ohio Revised Code ("R.C.") Section 4903.221, Ohio Administrative Code ("OAC") Rule 4901-1-11 and the Attorney Examiner's entry dated September 21, 2010, the Ohio Manufacturers' Association ("OMA") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OMA leave to intervene because OMA has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede OMA's ability to protect that interest.

MEMORANDUM IN SUPPORT

On September 1, 2010 Columbus Southern Power Company and Ohio Power Company (collectively "AEP Companies") filed an application for the administration of the significantly excessive earnings test as required by R.C. 4928.143(F) and OAC) Rule 4901:1-35-10. OMA member companies will be impacted by the Commission's decision relating to whether the AEP Companies experienced significantly excessive earnings in 2009.

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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 significant 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 proceeding will have a substantial effect on the electricity costs of OMA members in the service area of the AEP Companies. Because this proceeding will be a case of first impression for the Commission under the significantly excessive earnings test ("SEET") of R.C. 4928.143, its outcome may have effects on OMA members beyond AEP's service territories.

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 this proceeding; and that its participation in this proceeding 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 this proceeding and should grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

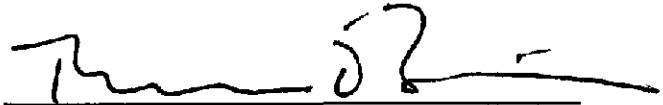
Respectfully submitted on behalf of
OHIO MANUFACTURERS' ASSOCIATION

A handwritten signature in black ink, appearing to read 'Tom O'Brien', is written over a horizontal line.

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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 27th day of September 2010 *via* first class mail.



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