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PUCO

Via Overnight Mail

February 1, 2011

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 11-351-EL-AIR, 11-352-EL-AIR, 11-353-EL-ATA, 11-354-EL-ATA, 11-356-EL-AAM and 11-358-EL-AAM

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of **THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT** filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

MLKkew

Encl.

Cc: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 1st day of February, 2011 to the following:



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Michael L. Kurtz, Esq.

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GAHANNA OH 43230

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AMERICAN ELECTRIC POWER
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COLUMBUS OH 43215

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INDUSTRIAL ENERGY USERS OF OHIO
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COLUMBUS OH 43215

OLIKER, JOSEPH E ATTORNEY
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21 EAST STATE STREET, 17TH FLOOR
COLUMBUS OHIO 43215

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Columbus Southern	:	
Power Company and) Ohio Power Company, Individually	:	Case No. 11-351-EL-AIR
and, if) Their Proposed Merger is Approved, as a) Merged	:	Case No. 11-352-EL-AIR
Company (collectively, AEP Ohio)) for an Increase in	:	
Electric Distribution Rates)	:	
	:	
hi the Matter of the Application of Columbus Southern	:	Case No. 11-353-EL-ATA
Power Company and Ohio Power Company, Individually	:	Case No. 11-354-EL-ATA
and, if Their Proposed Merger is Approved, as a Merged	:	
Company (collectively AEP Ohio) for Tariff Approval	:	
	:	
In the Matter of the Application of Columbus Southern	:	
Power Company and) Ohio Power Company, Individually	:	Case No. 11-356-EL-AAM
and, if) Their Proposed Merger is Approved, as a) Merged	:	Case No. 11-358-EL-AAM
Company (collectively AEP Ohio)) for Approval to Change	:	
Accounting Methods)	:	

**MOTION TO INTERVENTION OF THE
THE OHIO ENERGY GROUP**

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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February 1, 2011

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Columbus Southern	:	
Power Company and) Ohio Power Company, Individually	:	Case No. 11-351-EL-AIR
and, if) Their Proposed Merger is Approved, as a) Merged	:	Case No. 11-352-EL-AIR
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Electric Distribution Rates)	:	
	:	
hi the Matter of the Application of Columbus Southern	:	Case No. 11-353-EL-ATA
Power Company and Ohio Power Company, Individually	:	Case No. 11-354-EL-ATA
and, if Their Proposed Merger is Approved, as a Merged	:	
Company (collectively AEP Ohio) for Tariff Approval	:	
	:	
In the Matter of the Application of Columbus Southern	:	
Power Company and) Ohio Power Company, Individually	:	Case No. 11-356-EL-AAM
and, if) Their Proposed Merger is Approved, as a) Merged	:	Case No. 11-358-EL-AAM
Company (collectively AEP Ohio)) for Approval to Change	:	
Accounting Methods)	:	

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Aleris International, Inc., Amsted Rail Company, Inc., AK Steel Corporation, ArcelorMittal, USA, BP-Husky Refining, LLC, E.I. DuPont de Nemours & Company, Ford Motor Company, GE Aviation, Procter & Gamble Co., Linde, Inc., Praxair Inc., Severstal Wheeling and Worthington Industries. These companies purchase large amounts of electric power services from Columbus Southern Power and Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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February 1, 2011

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