

FILE

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Via Overnight Mail

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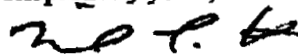
In re: Case No. 11-0346-EL-SSO

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

MLKkw  
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 1<sup>st</sup> day of February, 2011 to the following:



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David F. Boehm, Esq.

Michael L. Kurtz, Esq.

SATTERWHITE, MATTHEW  
1 RIVERSIDE PLAZA 29TH FLOOR  
COLUMBUS OH 43215

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Columbus :  
Southern Power Company And Ohio Power Company : **Case No. 11-0346-EL-SSO**  
For Authority To Establish A Standard Service Offer :  
Pursuant To 4928.143, Ohio Rev. Code, In The Form :  
Of An Electric Security Plan :

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

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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,



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David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

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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 : **Case No. 11-0346-EL-SSO**  
For Authority To Establish A Standard Service Offer :  
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**MEMORANDUM IN SUPPORT OF  
THE OHIO ENERGY GROUP'S  
MOTION TO INTERVENE**

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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,



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David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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February 1, 2011

**COUNSEL FOR THE OHIO ENERGY GROUP**