

FILE

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 Authority to Establish a Standard)
Service Offer Pursuant to §4928.143, Ohio Rev.)
Code, in the Form of an Electric Security Plan.)

Case No. 11-346-EL-SSO
Case No. 11-348-EL-SSO

In the Matter of the Application of Columbus)
Southern Power Company and Ohio Power)
Company for Approval of Certain Accounting)
Authority.)

Case No. 11-349-EL-AAM
Case No. 11-350-EL-AAM

MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Section 4903.221, Ohio Revised Code, Rule 4901-1-11, Ohio Administrative Code ("OAC"), and the Attorney Examiner's Entry dated February 9, 2011, the OMA Energy Group ("OMAEG") hereby respectfully moves for leave to intervene in the above-captioned proceedings. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMAEG has a real and substantial interest in these proceedings, and the Commission's disposition of these proceedings may impair or impede the OMAEG's ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay these proceedings and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in these proceedings. Additionally, OMAEG's interests will not be adequately represented by other parties to this proceeding. Accordingly, for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

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Respectfully submitted on behalf of
OMA ENERGY GROUP

A handwritten signature in black ink, appearing to read 'Lisa G. McAlister', written over a horizontal line.

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MEMORANDUM IN SUPPORT

On January 27, 2011, Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio") filed an application to establish a standard service offer ("SSO") in the form of an electric security plan ("ESP"). On the same date, AEP Ohio also filed an application for approval of certain accounting authorities.

The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from AEP Ohio and will be affected by the Commission's determination in these matters. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceedings.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMAEG submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership. Accordingly, the OMAEG respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
OMA ENERGY GROUP



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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 25th day of February 2011 via first class mail and electronic mail.


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