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# Exelon

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March 11, 2011

Public Utilities Commission of Ohio  
Docketing Division  
180 E. Broad Street, 10<sup>th</sup> Floor  
Columbus, OH 43215

PUCO

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RECEIVED-DOCKETING DIV

Re: Case Nos. 11-346-EL-SSO; 11-348-EL-SSO; 11-349-EL-AAM; 11-350-EL-AAM

Dear Sir/Madam:

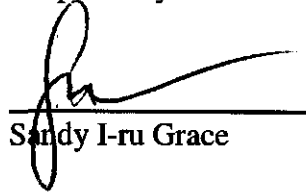
Please find enclosed the following for filing in the above referenced matter:

- i) the original and twelve (12) copies of Exelon Generation Company, LLC's Motion to Intervene and Memorandum in Support;
- ii) the original and twelve (12) copies of the Motion to Admit Sandy I-ru Grace to Practice *Pro Hac Vice Instante* Before the Commission;
- iii) the original and twelve (12) copies of the Motion to Admit Jesse Rodriguez to Practice *Pro Hac Vice Instante* Before the Commission.
- iv) (4) extra copies of the foregoing, to be date-stamped and returned in the enclosed self-addressed, stamped envelope.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered to the court clerk's office. Technician AD Date Processed 3/14/11

Please place these documents on file, date stamp the extra copies, and return them in the self-addressed stamped envelope.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Sandy I-ru Grace', written over a horizontal line.

Sandy I-ru Grace

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

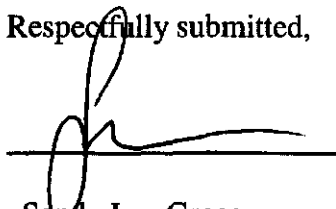
In the Matter of the Application Columbus	)	
Southern Power Company and Ohio Power	)	Case Nos. 11-346-EL-SSO
Company for Authority to Establish a Standard	)	11-348-EL-SSO
Service Offer Pursuant to § 4928.143, Ohio	)	
Rev. Code, in the Form of an Electric Security	)	
Plan.	)	

In the Matter of the Application of Columbus	)	Case Nos. 11-349-EL-AAM
Southern Power Company and Ohio Power	)	11-350-EL-AAM
Company for Approval of Certain Accounting	)	
Authority.	)	

**MOTION TO INTERVENE OF EXELON GENERATION COMPANY, LLC**

Pursuant to the Ohio Rev. Code § 4903.221 and Ohio Admin. Code § 4901-1-11, Exelon Generation Company, LLC (Exelon Generation) moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio (Commission) should grant Exelon Generation leave to intervene because Exelon Generation has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede Exelon Generation's ability to protect that interest.

Respectfully submitted,



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March 11, 2011

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Columbus )	
Southern Power Company and Ohio Power )	
Company for Authority to Establish a Standard )	Case Nos. 11-346-EL-SSO
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Plan. )	

In the Matter of the Application of Columbus )	
Southern Power Company and Ohio Power )	Case Nos. 11-349-EL-AAM
Company for Approval of Certain Accounting )	11-350-EL-AAM
Authority. )	

**MEMORANDUM IN SUPPORT OF  
MOTION FOR LEAVE TO INTERVENE OF  
EXELON GENERATION COMPANY, LLC**

Pursuant to Ohio Rev. Code § 4903.221 and Ohio Admin. Code § 4901-1-11, Exelon Generation Company, LLC (Exelon Generation) files this Memorandum in Support of Motion for Leave to Intervene in the above-captioned proceeding.

**I. Background**

On January 27, 2011, Columbus Southern Power Company and Ohio Power Company (AEP-Ohio) filed, pursuant to Ohio Rev. Code § 4928.143, a Standard Service Offer (SSO), in which it proposes to provide an Electric Security Plan (ESP) to its customers for the time period from January 1, 2012 through May 31, 2014. The current ESP is set to expire on December 31, 2011. In its filing, AEP-Ohio proposes various non-bypassable riders, all of which factor into the structure and pricing of the ESP. By order, the Attorney Examiner has established an intervention due date of March 14, 2011, with hearings commencing on July 13, 2011.

## **II. Motion for Intervention**

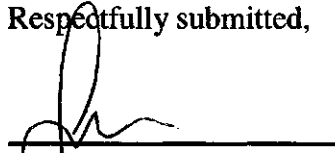
Exelon Generation, which owns or controls approximately 30,000 MW of generating facilities, is a subsidiary of Exelon Corporation, which is located at 10 South Dearborn Street, Chicago, Illinois. Exelon Power Team is the wholesale marketing division of Exelon Generation and is a leading power marketer throughout the country. Exelon Energy Company (Exelon Energy) is a wholly-owned subsidiary of Exelon Generation and is (i) an electric retail service provider in Illinois, Pennsylvania and Ohio; and (ii) a gas retail service provider in Illinois, Michigan, Ohio and Pennsylvania. The issues addressed in this case will significantly affect the retail electric market in Ohio, including future contracts in which Exelon Energy may seek to enter.

No other party to this proceeding can adequately represent Exelon Generation's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party. Accordingly, Exelon Generation has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code § 4903.221 and Ohio Admin. Code § 4901-1-11.

### III. Conclusion

Wherefore, in consideration of the foregoing, Exelon Generation respectfully requests that this Commission grant it intervenor status in the above-captioned proceeding.

Respectfully submitted,



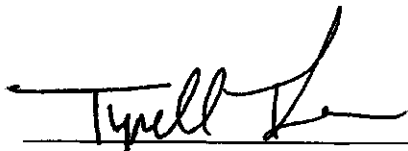
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### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (where available) and by first-class postage prepaid mail, to all parties on this 11th day of March, 2011.

  
Tyrell Robinson

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\*Indicates that party has agreed to be automatically served via electronic mail.