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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO PUCO

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company for Authority to) Case No. 11-346-EL-SSO
Establish a Standard Service Offer Pursuant) Case No. 11-348-EL-SSO
to Section 4928.143, Revised Code, in the)
Form of an Electric Security Plan.)
)

In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 11-349-EL-AAM
Ohio Power Company for Approval of) Case No. 11-350-EL-AAM
Certain Accounting Authority.)
)

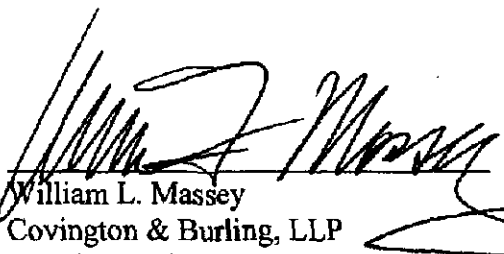
MOTION TO INTERVENE OF THE COMPETE COALITION

Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, the COMPETE Coalition ("COMPETE") hereby respectfully moves for intervention in the above styled proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, COMPETE respectfully requests that the Commission grant this motion for leave to intervene and that COMPETE be made a full party of record.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT
OF THE MOTION TO INTERVENE OF
THE COMPETE COALITION**

Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, establish the standard for intervention in the above-styled proceeding as a full party of record. Intervention is permitted if a person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties. In addition to establishment of a direct interest, the factors that the Public Utilities Commission of Ohio (the "Commission") considers in implementing the above rule are the nature of the intervenor's interest, the extent that interest is represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. (See also R.C. 4903.221(B) upon which the above rule is authorized). A review of these factors in light of following facts supports granting COMPETE's intervention.

On January 27, 2011, Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio") filed an Application to establish a standard service ("SSO") in the form of an electric security plan ("ESP"). AEP Ohio's filing raises significant policy issues regarding the relationship between investment in electric generating assets and electricity market mechanisms.

COMPETE is an organization composed of more than 540 electricity stakeholders, including customers, suppliers, generators, transmission owners, trade associations, environmental organizations and economic development corporations, all of whom support well-

structured competitive electricity markets for the benefit of consumers. COMPETE members have a large presence in Ohio, and COMPETE members will be substantially affected by the outcome of this proceeding. Specifically, 13 of COMPETE's members have headquarters located in Ohio and 41 of COMPETE's large electricity customer members operate in Ohio with over 3,400 stores or other facilities. The policy choices presented by AEP Ohio's filing will affect the wholesale and retail markets in Ohio and in turn will affect COMPETE's members' opportunities for securing electricity at reasonable prices taking into account all associated costs. Accordingly, COMPETE and its customer members in Ohio have a direct and substantial interest in this proceeding.

The broad range of interests of COMPETE members in Ohio that support competitive electricity markets will not be adequately represented by other parties to this proceeding. Among other things, COMPETE brings pro-competition electricity customer voices to the regulatory proceedings that it enters. COMPETE has represented its members interests in supporting competitive electricity markets in various state proceedings as well as proceedings before the Federal Energy Regulatory Commission. Accordingly, COMPETE will make a significant contribution to the full development of the record in this proceeding, will assist in a full and robust airing of key competition issues, and will contribute to a just and expeditious resolution on the important issues before the Commission.

This motion for intervention is made on or before the March 14, 2011 deadline established by the attorney examiner. Thus, COMPETE's intervention is timely and should not unduly delay the instant proceedings.

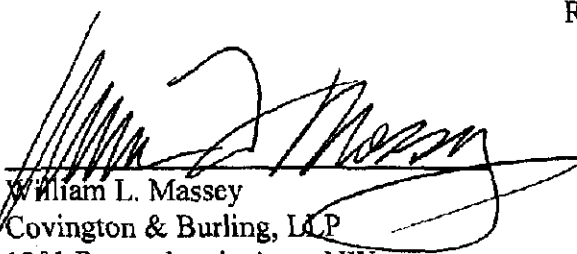
WHEREFORE, COMPETE respectfully requests that the Commission grant this motion for leave to intervene and that COMPETE be made a full party of record. For purposes of

receiving service in the proceeding, in addition to the undersigned, COMPETE requests that the following persons be placed on the official service list:

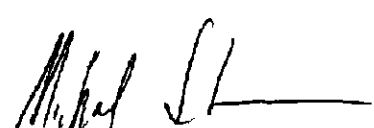
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing documents was served this 14th day of March, 2011 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.


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