

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

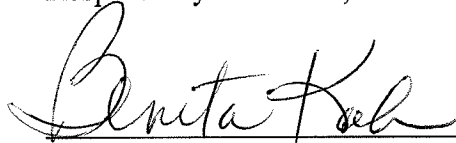
In the Matter of the Application of)	
Columbus Southern Power Company and)	Case Nos. 11-351-EL-AIR
Ohio Power Company, Individually and, if)	11-352-EL AIR
Their Proposed Merger is Approved, as a)	
Merged Company (Collectively, AEP Ohio))	
For an Increase in Electric Distribution Rates)	
)	
In the Matter of the Application of Columbus)	
Southern Power Company and Ohio Power)	
Company, Individually, and if Their Proposed)	Case Nos. 11-353-EL-ATA
Merger is Approved, as a Merged Company)	11-354-EL-ATA
(collectively, AEP Ohio) for Tariff Approval.)	
)	
In the Matter of the Application of Columbus)	
Southern Power Company and Ohio Power)	
Company, Individually, and if Their Proposed)	Case Nos. 11 -356-EL-AAM
Merger is Approved, as a Merged Company)	11-358-EL-AAM
(collectively, AEP Ohio) for Approval to)	
Change Accounting Methods.)	

**MOTION TO INTERVENE OF
THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code ("OAC"), The Ohio Cable Telecommunications Association ("the OCTA") moves for leave to intervene in this proceeding. The reasons supporting the Motion to Intervene are set forth in the accompanying memorandum in support.

WHEREFORE, the OCTA respectfully requests that it be permitted to intervene in these matters.

Respectfully submitted,



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Telecommunications Association*

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MEMORANDUM IN SUPPORT

On February 28, 2011, Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio") individually and if their proposed merger is approved, as a single merged company, filed an Application for an increase in its electric distribution rates, tariff changes, and requested approval to change accounting methods. AEP Ohio's application includes a proposal to change its Pole Attachment Schedules in the tariffs. The Pole Attachment Schedules in the Application propose rates and regulations for use by third parties of poles and conduit space owned by AEP Ohio. Because members of the OCTA will be affected by these rates and regulations, the OCTA is requesting that the Commission allow the OCTA to intervene in this proceeding.

A. The Commission's Standard For Intervention Requests

Section 4903.221, Revised Code, sets forth the criteria the Commission must consider when ruling on a motion to intervene:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; and
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

To implement the statutory provision the Commission promulgated Rule 4901-1-11(B) of the Ohio Administrative Code which specifies that when deciding whether to permit intervention, the Commission, Legal Director, Deputy Legal Director, or Attorney Examiner shall consider:

- (1) The nature and extent of the prospective intervenor's interest.
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case.
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings.
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.
- (5) The extent to which the person's interest is represented by existing parties.

As will be explained, the OCTA has a significant interest in the proposed changes to the Pole Attachment Schedules in the proposed revised tariffs and meets all the

remaining considerations of both the statute and the rule. The OCTA's interests in, and contributions to this proceeding require grant of this motion.

B. OCTA and Its Interests In This Proceeding

OCTA is a trade association made up of various cable television operators throughout Ohio. Today, OCTA members offer a variety of electronic communications services in addition to "linear" video services, including internet access and data services, as well as interconnected voice over internet protocol-enabled service ("VoIP"). To provide these services, OCTA's members attach their facilities to utility poles owned and controlled both by electric utilities and incumbent local exchange carriers ("ILECs").

OCTA has a real and substantial interest in this proceeding. AEP Ohio's proposed changes to the Pole Attachment Schedules will result in substantial increases to cost of OCTA members to provide service. The proposed Pole Attachment Schedule also changes terms and conditions of service in a manner that will be unfavorable to OCTA's members and their customers. The proposed rate increases more than double, and in some situations triple, the fees associated with pole attachments. These proposed changes by AEP Ohio will clearly affect OCTA's members ability to provide communications services at a reasonable and dependable rate to their customers.

As of the filing of this motion to intervene, no other party in this case has intervened to protect the interests of companies providing communications services similar to those of the OCTA members that will be affected by the pole attachment provisions. Thus, the interests of OCTA and its members in the Pole Attachment Schedules of the proposed revised tariff are not currently represented by any other party to the proceeding. As a result, OCTA will significantly contribute to the full development

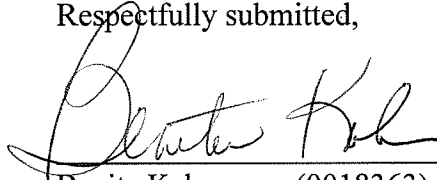
and equitable resolution of the factual issues regarding changes to the Pole Attachment Tariff in this Application. Further, OCTA's intervention will not unduly delay this proceeding as no hearing date has been set for this proceeding.

Conclusion

OCTA and its members clearly have a real and substantial interest in this proceeding which is not represented by others and clearly has expertise and perspective that will assist the Commission in making the required legal determinations. OCTA has moved timely to request intervention in this proceeding and submits that it will participate on a timely basis and in a substantive fashion that will allow the Commission to reach a determination on AEP Ohio's proposed changes to the Pole Attachment Schedule of the tariffs consistent with the Commission's statutory obligations, precedent, and policies. Further, the failure to grant intervention in this case will impede the ability of OCTA's members to protect and defend their interests. In sum, OCTA has met the Commission's standards for intervention.

For these reasons, the OCTA respectfully requests that the Commission find that OCTA's motion to intervene be granted in accordance with R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted,



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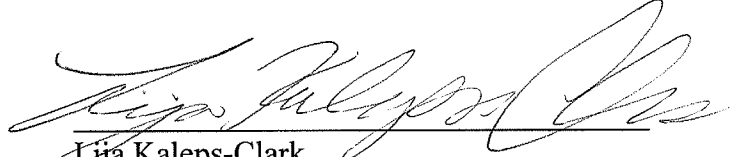
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion to Intervene was served upon the following persons via email this 18th day of April, 2011.


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Case No(s). 11-0351-EL-AIR, 11-0352-EL-AIR, 11-0353-EL-ATA, 11-0354-EL-ATA, 11-0356-EL-AAM, 1

Summary: Motion Motion to Intervene of the Ohio Cable Telecommunications Association
electronically filed by Benita Kahn on behalf of Ohio Cable Telecommunications Association