

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus )  
Southern Power Company and Ohio Power )  
Company to Update Their Environmental ) Case No. 11-1337-EL-RDR  
Investment Carrying Cost Riders )

---

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF INDUSTRIAL ENERGY USERS-OHIO**

---

RECEIVED-DOCKETING DIV  
2011 MAY -6 PM 5:14  
PUCO

Samuel C. Randazzo (Counsel of Record)  
Joseph E. Olikier  
Frank P. Darr  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>TH</sup> Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
sam@mwncmh.com  
joliker@mwncmh.com  
fdarr@mwncmh.com

May 6, 2011

**Attorneys for Industrial Energy Users-Ohio**

This is to certify that the images appearing are an  
accurate and complete reproduction of a case file  
document delivered in the regular course of business.  
Technician        Date Processed 5/6/11

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus	)	
Southern Power Company and Ohio Power	)	
Company to Update Their Environmental	)	Case No. 11-1337-EL-RDR
Investment Carrying Cost Riders	)	

---

**MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO**

---

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On March 18, 2011, the Columbus Southern Power Company ("CSP") and Ohio Power Company ("OPCo") (collectively, "AEP") filed an Application to Update Their Environmental Investment Carrying Cost Riders ("EICCR").<sup>1</sup> The Companies propose to adjust the EICCR based upon incremental environmental investments made in 2010.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to

---

<sup>1</sup> *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company to Update Their Environmental Investment Carrying Cost Riders*, Case No. 11-1337-EL-RDR, Application (March 18, 2011) (hereinafter "Application").

protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,



---

Samuel C. Randazzo (Counsel of Record)

Joseph E. Olikar

Frank P. Darr

MCNEES WALLACE & NURICK LLC

21 East State Street, 17<sup>TH</sup> Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

joliker@mwncmh.com

fdarr@mwncmh.com

**Attorneys for Industrial Energy Users-Ohio**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbus )	
Southern Power Company and Ohio Power )	
Company to Update Their Environmental )	Case No. 11-1337-EL-RDR
Investment Carrying Cost Riders )	

---

**MEMORANDUM IN SUPPORT**

---

In support of this Motion to Intervene, Industrial Energy Users-Ohio ("IEU-Ohio") states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at [http://www.ieu-ohio.org/member\\_list.aspx](http://www.ieu-ohio.org/member_list.aspx). IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's Electric Distribution Utilities ("EDU").

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to SB 221, and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

  
\_\_\_\_\_  
Samuel C. Randazzo (Counsel of Record)

Joseph E. Olier

Frank P. Darr

MCNEES WALLACE & NURICK LLC

21 East State Street, 17<sup>TH</sup> Floor

Columbus, OH 43215

**Attorneys for Industrial Energy Users-Ohio**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 6th day of May, 2011 via first class mail, postage prepaid.

  
\_\_\_\_\_  
Joseph E. Olikar

Steven T. Nourse, Counsel of Record  
(Counsel of Record)  
Matthew J. Satterwhite  
Anne Vogel  
American Electric Power Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215-2373  
stnourse@aep.com  
mjsatterwhite@aep.com  
amvogel@aep.com

**ON BEHALF OF COLUMBUS SOUTHERN  
POWER COMPANY AND OHIO POWER  
COMPANY**

Michael DeWine  
Ohio Attorney General  
William L. Wright  
Section Chief  
Thomas G. Lindgren  
(Counsel of Record)  
Devin Parram  
Assistant Attorney General  
Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, OH 43215-3793  
william.wright@puc.state.oh.us  
thomas.lindgren@puc.state.oh.us  
devin.parram@puc.state.oh.us

**ON BEHALF OF STAFF OF THE PUBLIC  
UTILITIES COMMISSION OF OHIO**

Janine L. Migden-Ostrander  
Ohio Consumers' Counsel  
Terry L. Etter  
(Counsel of Record)  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
etter@occ.state.oh.us

**ON BEHALF OF THE OFFICE OF THE OHIO  
CONSUMERS' COUNSEL**