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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

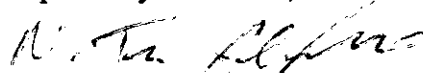
In the Matter of the Long-Term Forecast)
Report of Ohio Power Company and) Case Nos. 11-2501-EL-FOR
Columbus Southern Power Company.) 11-2502-EL-FOR

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**MOTION TO INTERVENE
OF FIRSTENERGY SOLUTIONS CORP.**

Pursuant to Ohio Revised Code § 4903.221 and O.A.C. 4901-1-11, FirstEnergy Solutions Corp. ("FES") moves to intervene in these proceedings. FES has a number of real and substantial interests in these proceedings and its interests that will not be adequately represented by any other parties to the proceedings. If FES is not allowed to intervene and represents its interests, FES may be prejudiced by the results of these proceedings. Thus, as set forth more fully in the attached memorandum in support, FES respectfully requests that the Commission grant this request to intervene.

Respectfully submitted,



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In the Matter of the Long-Term Forecast)	
Report of Ohio Power Company and)	Case Nos. 11-2501-EL-FOR
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**MEMORANDUM IN SUPPORT OF THE
MOTION TO INTERVENE OF FIRSTENERGY SOLUTIONS CORP.**

Columbus Southern Power Company and Ohio Power Company (collectively, the “Companies”) recently filed their 2011 long-term forecast report (“LTFR”). The Companies’ LTFR includes information regarding energy receipts, deliverables, and load forecasts within the Companies’ service territories, as well as the location of planned electric transmission lines and new generation units. FirstEnergy Solutions Corp. (“FES”), a competitive retail electric service (“CRES”) provider in the Companies’ service territories, hereby requests that the Commission allow it to intervene in the Companies’ LTFR proceedings.

R.C. § 4903.221 provides that any “person who may be adversely affected by a public utilities commission proceeding” may intervene in the proceeding. The Commission’s own rules reinforce the right to intervene:

Upon timely motion, any person *shall be* permitted to intervene in a proceeding upon a showing that . . . [t]he 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.

O.A.C. 4901-1-11(A) (emphasis added). “The regulation’s text is very similar to Civ. R. 24 – the rule governing intervention in civil cases in Ohio – which is generally liberally construed in favor of intervention.” *Ohio Consumers’ Counsel v. Pub. Util. Comm.*, 111 Ohio St. 3d 384, 387

(2006) (internal quotations omitted). In considering a motion to intervene, the Commission's rule directs that the Commission should consider: the nature and extent of the intervenor's interest; the legal position advanced by the intervenor and its probable relation to the merits of the case; whether intervention will unduly prolong or delay the proceedings; whether the intervenor will significantly contribute to full development and equitable resolution of the factual issues; and the extent to which the intervenor's interest is represented by existing parties. *See* O.A.C. 4901-1-11(B)(1)-(5); *see also* R.C. § 4903.221(B)(1)-(4). FES's motion to intervene satisfies each of these factors.

FES is an owner and operator of electric generating facilities located in Ohio and elsewhere. FES also serves as a CRES provider to customers in the Companies' service territories. Therefore, FES has real and substantial interests in the Companies' LTFR, which impacts FES's interests as supplier to customers of the Companies. For example, FES has an interest in ensuring that the LTFR correctly reflects available supply in the Companies' territories. Further, the Companies' pending Application for approval of their standard-service offer ("SSO") pursuant to R.C. § 4928.143 (the "ESP") includes several provisions that are based on the Companies' "need" for generation.¹ For example, the ESP contains a request for a nonbypassable rider to recover costs associated with a solar generation facility. The structure and pricing of the Companies' proposed ESP will directly impact FES's ability to provide competitive services and, more generally, the competitive market in the Companies' service territories. FES, therefore, has an additional real and substantial interest in insuring that the competitive retail market for electric service in the Companies' service territory is not harmed based on any representations made in the Companies' LTFR proceedings.

¹ *See 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 Nos. 11-0346-EL-SSO and 11-0348-EL-SSO, Application, filed Jan. 27, 2011, pp. 10-11.

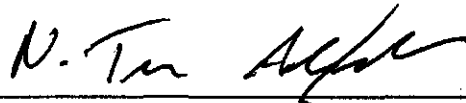
FES's intervention also is proper and appropriate because of its substantial experience in the issues raised by these proceedings. FES has significant experience as a provider of a wide range of energy and energy-related products and services, including the generation and sale of electricity and energy planning and procurement, to wholesale and retail customers – including retail customers in the Companies' service territories. Therefore, FES's participation in these LTFR proceedings can assist the Commission and Staff in an assessment of the Companies' forecasts. FES also has substantial experience in promoting fair and open competitive markets through participation in Commission proceedings.² These LTFR proceedings may impair or impede FES's ability to protect its and other CRES providers' interests, as well as FES's ability to fully develop the issues associated with the Companies' ESP Application. Thus, FES respectfully requests that the Commission grant its motion to intervene in this proceeding.

Finally, FES's request for intervention is timely and no other parties represent FES's interests. The Companies' LTFR was only recently filed and the Attorney Examiner has not yet issued any procedural schedules. Further, no other parties have sought to intervene. Therefore, FES's intervention will not unduly prolong or delay these proceedings, but rather will significantly contribute to the full development and resolution of the issues raised by the Companies' LTFR and by their ESP.

WHEREFORE, FES respectfully requests that the Commission grant this Motion to Intervene and that it be made a party of record to these proceedings.

² See, e.g., *In re Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply*, Case No. 10-2586-EL-SSO, Mot. to Intervene of FES, filed Nov. 19, 2010; *In re Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply*, Case No. 09-906-EL-SSO, Mot. to Intervene of FES, dated Nov. 25, 2009.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene of FirstEnergy Solutions Corp.* and *Memorandum in Support* thereof was served this 17th day of May, 2011, via first-class U.S. mail, postage-prepaid, upon the parties below.



One of the Attorneys for FirstEnergy Solutions Corp.

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