

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long Term Forecast)
Report of Ohio Power Company and)
Related Matters.)
)
In the Matter of the Long-Term Forecast)
Report of Columbus Southern Power)
Company and Related Matters.)

Case No. 11-2501-EL-FOR

Case No. 11-2502-EL-FOR

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MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the OMA Energy Group ("OMAEG") hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMAEG has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede the OMAEG's ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay this proceeding and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMAEG's interests will not be adequately represented by other parties to this proceeding. Accordingly, for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

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Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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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 Related Matters.))))	Case No. 11-2501-EL-FOR
In the Matter of the Long-Term Forecast Report of Columbus Southern Power Company and Related Matters.)))	Case No. 11-2502-EL-FOR

MEMORANDUM IN SUPPORT

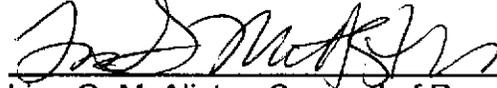
Rule 4901:5-3-01(A), Ohio Administrative Code (O.A.C.), requires each electric utility and electric transmission owner to file annually a long-term forecast report ("LTFR") on or before April fifteenth of each year. On April 15, 2011, Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP", collectively, "AEP-Ohio") filed a LTFR. The members of the OMAEG will be affected by the Commission's determination of the matters raised in AEP-Ohio's LTFR and the OMAEG should be permitted to intervene in the above-captioned proceedings.

The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from AEP-Ohio, and will be affected by the Commission's

determination in this matter. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMAEG submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership. Accordingly, the OMAEG respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 21st day of July 2011 via first class mail.


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