

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company for)	Case No. 11-5568-EL-POR
Approval of its Program Portfolio Plan and)	
Request for Expedited Consideration.)	

In the Matter of the Application of)	
Ohio Power Company for Approval of its)	Case No. 11-5569-EL-POR
Program Portfolio Plan and Request for)	
Expedited Consideration.)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE
AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
Telephone: (419) 425-8860
e-mail: cmooney2@columbus.rr.com

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced matters concern the applications of Columbus Southern Power Company and Ohio Power Company (together, “Companies”) for approval of their Program Portfolio Plans.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in these matters.

OPAE is an Ohio corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in these proceedings, which concern the Program Portfolio Plans of the Companies. Additionally, OPAE includes as members non-

profit organizations located in the service areas that will be affected by these proceedings.¹ Moreover, many of OPAE's members are community action agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, community action is charged with advocating for low-income residents of their communities.²

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low income customers of the Companies. OPAE members are also ratepayers of the Companies. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of these proceedings. OPAE's primary interest in these cases is to protect the interests of low and moderate income Ohioans and OPAE

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

² See 42 U.S.C. 672:

The purposes of this subtitle are--

(1) to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient (particularly families who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)); and

(2) to accomplish the goals described in paragraph (1) through--

(A) the strengthening of community capabilities for planning and coordinating the use of a broad range of Federal, State, local, and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions;

(B) the organization of a range of services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in the community and may help the families and individuals to achieve self-sufficiency;

(C) the greater use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown;

(D) the maximum participation of residents of the low-income communities and members of the groups served by programs assisted through the block grants made under this subtitle to empower such residents and members to respond to the unique problems and needs within their communities; and

(E) the broadening of the resource base of programs directed to the elimination of poverty so as to secure a more active role in the provision of services for--

(i) private, religious, charitable, and neighborhood-based organizations; and

(ii) individual citizens, and business, labor, and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.

members whose provision of electric service will be affected by these proceedings. Moreover, OPAE is a signatory party to the Stipulation and Recommendation filed in these proceedings on November 29, 2011.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede OPAE's ability to protect its interests. No other party to the matters will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate, service provider and nonprofit customer group. No other party represents this group of interests. OPAE's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these proceedings. Therefore, OPAE's intervention in these proceedings should be granted.

Respectfully submitted,

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
Telephone: (419) 425-8860
or (614) 488-5739
FAX: (419) 425-8862
cmooney2@columbus.rr.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support was served electronically on these parties on this 29th day of November 2011.

Colleen L. Mooney

Anne M. Vogel
Steven T. Nourse
American Electric Power Corp.
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
mjsatterwhite@aep.com

Matthew Pritchard
Joseph E. Olier
Frank P. Darr
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, Ohio 43215
mpritchard@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com

Thomas McNamee
Attorney General's Office
Public Utilities Commission Section
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215-3793
thomas.mcnamee@puc.state.oh.us

Henry W. Eckhart
1200 Chambers Road #106
Columbus, Ohio 43212
henryeckhart@aol.com

Kyle Kern
Terry L. Etter
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43212
kern@occ.state.oh.us
etter@occ.state.oh.us

Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com

Nolan Moser
Cathryn N. Loucas
The Ohio Environmental Council
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212
nmoser@theOEC.org
cloucas@theOEC.org

Christopher Allwein
Williams, Allwein and Moser
1373 Grandview Ave., Suite 212
Columbus, Ohio 43212
callwein@williamsandmoser.com

Michael Smalz
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, Ohio 43215
msmalz@ohiopovertylaw.org

Thomas J. O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
tobrien@bricker.com

Richard Sites
Ohio Hospital Association
155 E. Broad Street, 15th Floor
Columbus, Ohio 43215
ricks@ohanet.org

Douglas G. Bonner
Emma F. Hand
SNR Denton US LLP
1301 K Street NW
Suite 600 East Tower
Washington DC
doug.bonner@snrdenton.com
ehand@snrdenton.com

Tara Santerelli
Environmental Law and Policy Center
1207 Grandview Avenue
Columbus, Ohio 43212
tsantarelli@elpc.org

Lisa G. McAlister
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
lmcalister@bricker.com

Chad Endsley
Ohio Farm Bureau Federation
280 North High Street
Columbus, Ohio 43215
cendsley@ofbf.org

Mark S. Yurick
Zachary D. Kravitz
Chester Willcox & Saxbe
65 East State Street, Suite 1000
Columbus, Ohio 43215
myurick@cwsllaw.com
zkravitz@cwsllaw.com

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Summary: Motion to Intervene electronically filed by Ms. Colleen L Mooney on behalf of Ohio Partners for Affordable Energy