

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

MOTION TO INTERVENE OF THE OHIO MANUFACTURERS ASSOCIATION

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

Respectfully submitted on behalf of
THE OHIO MANUFACTURERS ASSOCIATION

A handwritten signature in cursive script, appearing to read "L. G. McAlister", written in dark ink.

Lisa G. McAlister, Counsel of Record

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MEMORANDUM IN SUPPORT

In 2008, the Ohio General Assembly passed Amended Substitute Senate Bill 221 ("SB 221"), which includes new Section 4928.66, Revised Code, establishing energy efficiency and peak demand reduction ("EE/PDR") benchmarks. As part of the electric security plan ("ESP") of Ohio Power Company ("OP") and Columbus Southern Power Company ("CSP", collectively, "AEP-Ohio"), the Public Utilities Commission of Ohio ("Commission") approved a non-bypassable EE/PDR Rider in Case Nos. 08-917-EL-SSO et al. Additionally, on May 15, 2010, the Commission approved a three year EE/PDR plan that ends at the end of 2011. On November 29, 2011, AEP-Ohio and others, including the OMA, filed a joint Stipulation and Recommendation that sets forth the EE/PDR plan for the companies for the 2012-2014 period.

The members of OMA will be impacted by the Commission's decision relating to the EE/PDR plan, and thus, the OMA should be permitted to intervene in the above-captioned proceeding.

The OMA is the only statewide association exclusively serving manufacturers. It has more than 1,600 Ohio manufacturing companies as members. OMA's member

companies consume significant amounts of electrical energy and must rely on AEP-Ohio to deliver the electric power necessary in their operations.

OMA members purchase electric power services from AEP-Ohio, and will be affected by the Commission's determination in this matter. Accordingly, the OMA 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 OMA 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 OMA's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership.

Accordingly, the OMA 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
THE OHIO MANUFACTURERS ASSOCIATION



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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 30th day of November 2011 via electronic mail and/or first class mail.

A handwritten signature in black ink, appearing to read "Lisa G. McAlister", written over a horizontal line.

Lisa G. McAlister

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Summary: Motion to Intervene electronically filed by Teresa Orahod on behalf of Ohio Manufacturers' Association