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BEFORE

OHIO POWER SITING BOARD

In the Matter of the Application of the City
Of Hamilton and American Municipal Power,
Inc., for a Certificate of Environmental
Compatibility and Public Need for the
Construction of a Transmission Line in
Franklin and Washington Townships.

Case No. 10-2439-EL-BSB

In the Matter of the Application of the City
Of Hamilton and American Municipal Power,
Inc., for a Certificate of Environmental
Compatibility and Public Need for the
Construction of a Transmission Line in
Franklin and Washington Townships.

Case No. 10-2440-EL-BTX

PETITION FOR LEAVE TO INTERVENE OF EASTER A. ADKINS
AND MEMORANDUM IN SUPPORT

Richard B. Uhle, Jr. (0022073)
Trial Counsel for EASTER A.
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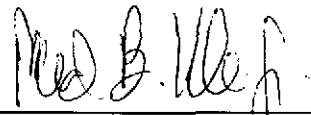
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Case No. 10-2440-EL-BTX

PETITION FOR LEAVE TO INTERVENE OF EASTER A. ADKINS

Pursuant to Ohio Administrative Code section 4906-7-04(A)(2), EASTER A. ADKINS, through her undersigned attorney and trial counsel, petitions the Ohio Power Sitting Board for leave to intervene in the above captioned proceedings, specifically Case No. 10-2440-EL-BTX and Case No. 10-2349-EL-BSB. These proceedings have been consolidated by Entry dated July 27, 2011.



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Case No. 10-2440-EL-BTX

MEMORANDUM IN SUPPORT OF PETITION FOR
LEAVE TO INTERVENE

EASTER A. ADKINS is the owner of real property located at 2810 Bert Reed Memorial Rd., Felicity, Ohio 45120 in Franklin and Washington Townships, Clermont County, Ohio. This real estate is known as parcel No. 08-21-13A-009., 08-21-13A-890. And 43-33-09E-028. For a total of 22.075 acres.

Easter A. Adkins is the mother of Gabrae L. Hack. Mrs. Adkins and her family purchased this property. The property was subdivided and developed and three homes and a business were planned. Petitioner planned to retire to this rural setting and live close to her family. .

Septic systems were installed and extensive excavating and site work was done. The family has now ceased development due to the proximity of the power lines and

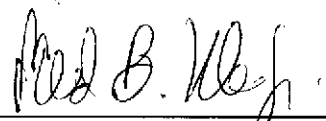
loss of property value. Petitioner stands to lose her entire investment made toward the development of their land as well as a significant loss in total value.

Petitioner seeks a re-hearing and compensation for the family's losses.

Petitioner and the family were not represented by any other party.

The proposed electrical transmission line is believed to be planned to come within 100 feet of petitioners' property. The presence of the transmission line will interfere with petitioners' personal and business use of their property and reduce the property value. The Hacks and their family oppose the location of the transmission line.

The City of Hamilton and American Municipal Power, Inc. (collectively called "Applicants") are parties in this case. Petitioner's inclusion as an intervening party would not delay the proceedings or prejudice any party.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition for Leave to Intervene of EASTER A. ADKINS and Memorandum in Support was served by regular U.S. Mail upon the following parties of record and attorneys on the 22 day of December, 2011:

American Municipal Power-Ohio Inc.
Marc Gerken, P.E., President
1111 Schrock Road, Suite 100
Columbus, Ohio 43229-1155

John W. Bentine
Chester Wilcox & Saxbe LLP
65 E. State St., Suite 1000
Columbus, Ohio 43215

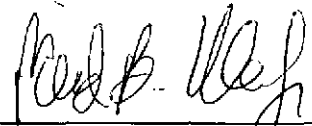
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