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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO 2012 MAR 28 AM 8:34

In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals.)

Case No.10-2376-EL-UNC PUCO

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 Section 4928.143, Revised Code, in the Form of an Electric Security Plan.)

Case No. 11-346-EL-SSO
Case No. 11-348-EL-SSO

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.)

Case No. 11-349-EL-AAM
Case No. 11-350-EL-AAM

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company to Amend their Emergency Curtailment Service Riders.)

Case No. 10-343-EL-ATA
Case No. 10-344-EL-ATA

In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company.)

Case No. 10-2929-EL-UNC

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Mechanisms to Recover Deferred Fuel Costs Ordered Under Section 4928.144, Revised Code.)

Case No. 11-4920-EL-RDR
Case No. 11-4921-EL-RDR

MOTION TO INTERVENE OF THE OHIO FARM BUREAU FEDERATION

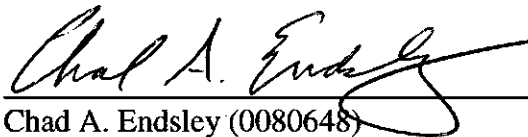
The Ohio Farm Bureau Federation (hereinafter referred to as "OFBF") pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative

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Code, moves for intervention in the above dockets as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth in the accompanying Memorandum of Support.

For the reasons more fully set forth in the accompanying Memorandum of Support, OFBF requests that its Motion to Intervene be granted and that it be made a full party of record.

Respectfully Submitted,



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Ohio)
Power Company and Columbus Southern) Case No.10-2376-EL-UNC
Power Company for Authority to Merge)
and Related Approvals.)**

**In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 11-346-EL-SSO
Ohio Power Company for Authority to) Case No. 11-348-EL-SSO
Establish a Standard Service Offer)
Pursuant to Section 4928.143, Revised)
Code, in the Form of an Electric Security)
Plan.)**

**In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 11-349-EL-AAM
Ohio Power Company for Approval of) Case No. 11-350-EL-AAM
Certain Accounting Authority.)**

**In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 10-343-EL-ATA
Ohio Power Company to Amend their) Case No. 10-344-EL-ATA
Emergency Curtailment Service Riders.)**

**In the Matter of the Commission Review)
of the Capacity Charges of Ohio Power) Case No. 10-2929-EL-UNC
Company and Columbus Southern Power)
Company.)**

**In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 11-4920-EL-RDR
Ohio Power Company for Approval of) Case No. 11-4921-EL-RDR
Mechanisms to Recover Deferred Fuel)
Costs Ordered Under Section 4928.144,)
Revised Code.)**

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE
OF THE OHIO FARM BUREAU FEDERATION**

I. Introduction

On January 27, 2011, Ohio Power Company and Columbus Southern Power Company (hereinafter referred to as “AEP-Ohio”) filed applications for authority to establish a Standard Service Offer (“SSO”) pursuant to Section 4928.143 of the Ohio Revised Code, in the form of an Electric Security Plan (“ESP”). On December 14, 2011, the Public Utilities Commission of Ohio (hereinafter referred to as the “PUCO” or the “Commission”) issued its Opinion and Order approving a stipulation resolving these proceedings, including PUCO Case No. 10-2929-EL-UNC involving AEP-Ohio’s capacity charges (“Capacity Charge Case”). However, on February 23, 2012, the Commission issued an Entry on Rehearing rejecting the stipulation. The Commission’s Entry on Rehearing explicitly instructed the attorney examiners to establish a new procedural schedule, including a new intervention deadline, to enable interested persons who had not previously participated in these proceedings to intervene.

On March 7, 2012, the Commission issued an Entry instructing the attorney examiners to establish an independent procedural schedule in the Capacity Charge Case. Additionally on March 7, 2012, AEP-Ohio notified the Commission that it would file a modified application ESP for authority to establish an SSO pursuant to Section 4928.143 of the Ohio Revised Code. This modified ESP would be filed before March 30, 2012.

As of the filing for this Motion to Intervene, AEP has not filed its modified ESP and SSO application, and the procedural schedule for this part of the proceedings has not been issued.

On March 13, 2012, the Commission filed an Entry in the Capacity Charge Case and approved an interim two-tiered capacity pricing mechanism proposed by AEP-Ohio. Under the mechanism, the first 21 percent of each customer class, with certain exceptions, is entitled to tier one reliability pricing (RPM) pricing. The second-tier charge for capacity is set at the higher price of \$255/MW-day.

On March 14, 2012, the Commission filed an Entry establishing the procedural schedule in the Capacity Charge Case. Motions to Intervene are to be filed by March 30, 2012.

These case proceedings and filings reflect provisions detailed in Amended Substitute Senate Bill Number 221 (SB 221) in 2008. The legislation amended Ohio's original electric restructuring plan created by Amended Substitute Senate Bill Number 3 (SB 3) in 1999. The Ohio Farm Bureau Federation (hereinafter referred to as "OFBF") has been active in rate restructuring proceedings concerning implementation of SB3 and SB 221. Moreover, OFBF was active as a party of record in establishment of the Ohio Power Company's and Columbus Southern Power Company's initial ESPs as detailed in PUCO Case Numbers 08-918-EL-SSO and 08-917-EL-SSO. The ability of OFBF's members to participate in the restructured electric market in AEP-Ohio's utility service area will be affected by the outcome of this case.

II. OFBF Should be Granted Intervention as a Party of Record

Pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, OFBF moves for intervention in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth herein.

Rule 4901-1-11 of the Ohio Administrative Code states in part:

(A) Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

(2) The 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 particular matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Included as factors to be considered are the nature of the intervener's interests, the extent to which those interests are represented by existing parties, the intervener's potential contribution

to the resolution of issues and whether intervention would result in undue delay of the proceeding. Ohio Adm. Code 4901-1-11(B). Similar provisions are detailed in Section 4903.221(B) of the Ohio Revised Code.

OFBF and its member county Farm Bureaus maintain a non-profit organization representing agricultural interests at the state and local levels. Over 213,000 member families belong to the organization. Farm Bureau members engage in a variety of industrial activities – food processing, commodity processing/conditioning/handling, biofuel production and general manufacturing; and mercantile operations – farms, agribusiness support, feed processing, grain conditioning and green house operation. Some members are involved in small business enterprises – restaurants, cleaners and other services. Moreover, all are residential energy consumers. Many of Farm Bureau’s members in rural, suburban and residential neighborhoods are served by AEP-Ohio.

During the period in which the stipulated ESP and SSO rates from this proceeding were in effect, OFBF received numerous comments and concerns from county Farm Bureau leadership and members in AEP-Ohio’s service territory. Farm, small business and residential energy consumers in rural areas reported double digit percentage increases in their electricity rates.

Over the past two decades OFBF has worked with the PUCO, other government agencies, public utilities and energy service providers to establish self-help electric aggregation programs. OFBF has conducted electric load profiling and data analysis programs specifically for farm and agribusiness energy users. Farm Bureau members have been involved in a variety of electric transmission and distribution infrastructure issues. Moreover, OFBF is engaged in technical work concerning utility-scale and on-site renewable energy generation, customer friendly interconnection, demand side management and energy efficiency programs. The ability

for Farm Bureau members to use collaboration, aggregation and market-based generation options to create programs and new tools to help them control energy costs will be affected by the outcome of this proceeding. The full potential for SB 221 to help these consumers will be impacted.

OFBF leaders will be able to share their program experiences and unique perspectives with the Commission as it works with the utility and others to develop effective outcomes for this case. Moreover, OFBF's participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party and will contribute to the just and quick resolution of issues and concerns raised.

Given the diverse, yet unique energy needs of its members, self-help experience, technical interests and support for collaboration, OFBF submits that good cause exists to grant it leave to intervene in this proceeding.

III. Conclusion

For the reasons set forth above, the Ohio Farm Bureau Federation requests that its Motion to Intervene be granted and that it be made a full party of record.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 28th day of March 2012, by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.

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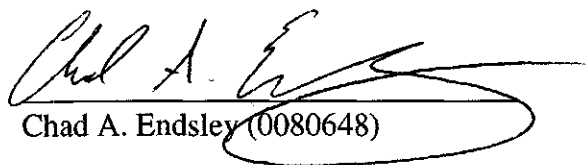
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