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**Via E-File**

April 12, 2012

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

**In re: Case Nos. 12-1126-EL-UNC**

Dear Sir/Madam:

Please find attached the MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP for filing in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

A handwritten signature in blue ink that reads "Mike Kurtz" with a small superscript "4" to the right.

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody M. Kyler, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Encl.

Cc: Certificate of Service

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Ohio Power	:	
Company For Approval Of Full Legal Corporate	:	<b>Case No. 12-1126-EL-UNC</b>
Separation And Amendment To Its Corporate	:	
Separation Plan	:	

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**MOTION TO INTERVENE OF THE  
THE OHIO ENERGY GROUP**

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Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

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March 19, 2012

**COUNSEL FOR THE OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Ohio Power	:	
Company For Approval Of Full Legal Corporate	:	<b>Case No. 12-1126-EL-UNC</b>
Separation And Amendment To Its Corporate	:	
Separation Plan	:	

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**MEMORANDUM IN SUPPORT OF  
THE OHIO ENERGY GROUP'S  
MOTION TO INTERVENE**

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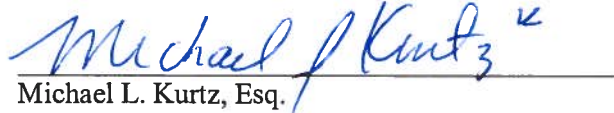
Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Aleris International, Inc., ArcelorMittal, USA, BP-Husky Refining, LLC, E.I. DuPont de Nemours & Company, Ford Motor Company, Procter & Gamble Co., Linde, Inc., O-I aka Owens-Brockway Glass Container, Inc., Praxair Inc., RG-Steel, The Timken Company and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

A handwritten signature in blue ink, reading "Michael L. Kurtz, Esq.", written over a horizontal line.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

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April 12, 2012

**COUNSEL FOR THE OHIO ENERGY GROUP**

## CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 12<sup>th</sup> day of April, 2012 to the following:



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**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 12-1126-EL-UNC**

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group