

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

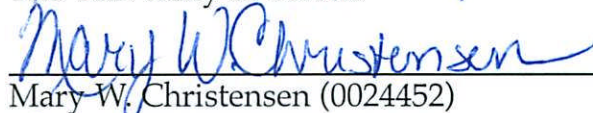
In the Matter of the Application of)	
of Columbus Southern Power Company)	Case No. 11-349-EL-AAM
and Ohio Power Company for)	Case No. 11-350-EL-AAM
Approval of Certain Accounting)	
Authority.)	

MOTION TO INTERVENE BY

University of Toledo Innovation Enterprises Corporation

The University of Toledo ("UT") respectfully requests that the Public Utilities Commission of Ohio ("Commission") grant its motion requesting intervention in the above-named matters for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted on behalf of
The University of Toledo



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MEMORANDUM IN SUPPORT

The University of Toledo (“UT”) is a leader in innovation and economic development. It identifies, facilitates, stimulates and supports commercial activity that is aligned with the University’s vision and mission to advance knowledge through excellence in learning, discovery and engagement, and a focus on innovation that is distinguished by exceptional strength in science and technology. The University of Toledo is helping the region become a transformative force for the world.

One critical component of UT’s mission is to drive the transition of Northwest Ohio from the “Glass Capital of the World” to the “Solar Capital of the World”. UT maintains over 100,000 square feet of laboratory space and a variety of campuses for industry use and collaboration, including the Wright Center for Photovoltaics and Commercialization (PVIC), the Nitschke Commercialization Complex and the Clean Energy and Alternative Energy Incubator. These assets allow UT to provide the resources necessary to support a vibrant and growing Solar Industry Cluster that has been nationally recognized as one of the top two solar clusters in the nation and has emerged as the core of a strong solar supply chain.

UT is very interested in becoming an intervener in this case because of its interest in ensuring that the 49.9 MW Turning Point Solar project ultimately is approved. The Turning Point project will source as many components as possible from Ohio Solar Supply Chain companies, and as one of the largest solar projects in the nation, will supply orders, jobs and capital investment critical to the continued development of the Ohio Solar Industry. Further, this project will supply enough panels to cause one of the world’s largest photovoltaic

manufacturers, Isofoton, to build its North American Headquarters in Napoleon, Ohio.

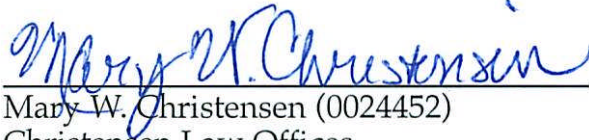
UT further desires intervenor status to defend the provisions of Ohio law and S.B. 221 (127th General Assembly) that specifically allow the Commission to order a nonbypassable charge for the purpose of new generation construction. As such, AEP's request to establish a Generation Resource Rider ("GRR") is appropriate and would serve as the mechanism by which a nonbypassable charge could be approved in a subsequent GRR case for the construction of the Turning Point Solar project.

UT meets the standards set forth in both the statute and the Commission's rules for intervention in this matter. It is, as described in Ohio Revised Code ("R.C.") Section 4903.221, a "person who may be adversely affected" by this proceeding insofar as any outcome in this proceeding may directly and indirectly affect the ability of the Northwest Ohio Solar Cluster and Ohio Solar Supply Chain to grow, the University's ability to drive Ohio, national and global innovation, and the prosperity of Ohioans learning and working in this growing industry. Further, UT's participation in this case will not unduly delay the proceedings, R.C. Section 4903.221 (B)(3).

Insofar as UT's intervention meets the criteria of Section 4903.221, it satisfies the standards set forth in the Commission's rule for intervention contained in Ohio Administrative Code Section 4901-1-11, including that its motion is timely and is made by a person with a real and substantial interest in

the outcome of this proceeding. For the foregoing reasons, UT requests that the Commission grant its request to intervene.

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CERTIFICATE OF SERVICE

I hereby certify that this Motion to Intervene has been served upon the parties of record and other interested parties who are listed on the attached service list by e-mail or first class, postage prepaid U.S. Mail this 20th day of April 2012.



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Summary: Motion Motion to Intervene By University of Toledo Innovation Enterprises Corporation electronically filed by Ms. Andrea P Govan on behalf of University of Toledo Innovation Enterprises Corporation and Ms. Mary W. Christensen