

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of)
Ohio Power Company's Distribution) Case No. 13-2394-EL-UNC
Investment Rider Plan.)

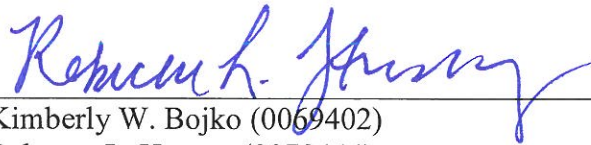
MOTION TO INTERVENE OF THE BELDEN BRICK COMPANY, LLC

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, The Belden Brick Company (Belden) hereby respectfully submits to the Public Utilities Commission of Ohio (Commission) its motion for leave to intervene in the above-captioned matter with the full powers and rights granted to intervening parties.

As demonstrated further in the attached Memorandum in Support, Belden has a real and substantial interest in this matter which may be adversely affected by the outcome of this proceeding, and which cannot be adequately represented by any existing parties. Accordingly, Belden satisfies the standard for intervention set forth in the Commission's rules and by statute.

WHEREFORE, Belden respectfully requests that the Commission grant its motion to intervene and make Belden a full party of record in this proceeding.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

On August 8, 2012, in Case No. 11-346-EL-SSO, et al., the Commission issued an Opinion and Order which, inter alia, modified and approved Ohio Power Company's (AEP Ohio or the Company) proposed Distribution Investment Rider (DIR). Further, on May 29, 2013, by means of a Finding and Order in Case No. 12-3129-EL-UNC, the Commission directed AEP Ohio to implement the DIR plan the Company developed with the Staff of the Commission (Staff) for 2013, in accordance with several specific terms outlined by the Commission. In that Finding & Order, the Commission also directed AEP Ohio, in coordination with Staff, to file a DIR plan for 2014.

As required by the Commission, AEP Ohio filed its DIR plan for 2014 in the above-captioned docket on December 16, 2013. The attorney examiner subsequently set a January 9, 2014 deadline for the filing of motions to intervene in the matter.

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-captioned proceeding. Section 4903.221, Revised Code, provides, in part, that any person "who may be adversely affected" by a Commission proceeding is entitled to seek intervention in that proceeding. Section 4903.221(B), Revised Code, further requires the Commission to consider the nature and extent of the prospective intervenor's interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor's potential contribution to a just and expeditious resolution of the issues involved.

Rule 4901-1-11, Ohio Administrative Code, permits intervention to a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the

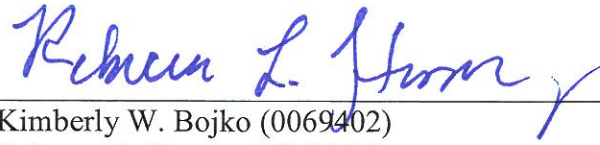
proceeding may impair or impede its ability to protect that interest and whose interest is not adequately represented by an existing party.

Belden owns and operates six plants in Tuscarawas County. It is the sixth largest (by production volume) manufacturer in the United States brick industry, employing approximately 500 people nationwide. Belden presently receives electric distribution service from AEP Ohio. As such, it will be affected by the Commission's determination in these matters. Therefore, Belden has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. Belden's unique knowledge and perspective as a significant distribution customer of AEP Ohio will contribute to the full development and equitable resolution of the factual issues in this proceeding, and Belden's interest will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

Belden satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, and is, therefore, authorized to intervene in this proceeding with the full powers and rights granted by the Commission to intervening parties.

WHEREFORE, Belden respectfully requests that the Commission grant its motion to intervene and designate it as a full party of record in this proceeding.

Respectfully submitted,



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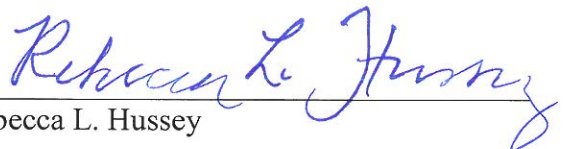
CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on January 9, 2014.

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Summary: Motion Motion to Intervene electronically filed by Ms. Rebecca L Hussey on behalf of The Belden Brick Company