

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company for Authority to	)	Case No. 13-2385-EL-SSO
Establish a Standard Service Offer	)	
Pursuant to §4928.143, Revised Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of	)	
Ohio Power Company for Approval of	)	Case No. 13-2386-EL-AAM
Certain Accounting Authority.	)	

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**APPALACHIAN PEACE AND JUSTICE NETWORK’S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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The Appalachian Peace and Justice Network (“APJN”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned cases pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission’s Code of Rules and Regulations. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

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PEACE AND JUSTICE NETWORK

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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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The Appalachian Peace and Justice Network (“APJN”) should be permitted to intervene in these applications pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced applications were made by Ohio Power Company for authority to establish a standard service offer in the form of an electric security plan and for approval of certain accounting authority.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. APJN meets all four criteria for intervention in these matters.

APJN is a nonprofit organization that empowers and challenges groups and individuals to work for peace and social justice. It has approximately 200 members in southeastern

(Appalachian) Ohio; the majority of its members are low-income and many of its members are customers or consumers of electric service provided by the Ohio Power Company. APJN engages in a wide range of educational and advocacy efforts to promote peace, social justice, and consumer protections for low-income residents of Appalachian Ohio. It has one part-time paid director//organizer (and one grant-funded staff person working on sexual assault prevention project), and its principal office is located in Athens, Ohio.

Further, APJN previously intervened in and actively participated in the AEP 2009 SEET case, PUCO Case No. 10-1261-EL-UNC, in the Companies' ESP II case, PUCO Case Nos. 11-346-EL-SSO and 11-348-EL-SSO, and In the Companies' distribution rate case, PUCO Case Nos. 11-351-EL-AIR and 11-351-EL-AI, AND IN THE AEP Program Portfolio Plan case, PUCO Case Nos. 11-5568-EL-POR and 11-5569-EL-POR.

APJN members are also non-residential ratepayers of Ohio Power Company. Further, APJN has been recognized by the Commission in the past as an advocate for low-income consumers in Appalachian Ohio, many of whom will be affected by the outcome of these applications. APJN's primary interest in these cases is to protect the interests of low-income Ohioans and, particularly rural consumers and consumers in Appalachian Ohio.

For the above reasons, APJN has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede APJN's ability to protect its interests. No other party to the matters will adequately represent the interests of APJN. APJN is the only intervenor that primarily serves as an advocate for low-income residential consumers in rural and Appalachian (Southeastern) Ohio residential consumers. APJN's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these proceedings. Additionally, this Motion

to Intervene is being filed with the PUCO more than a full month before the March 7, 2014 filing deadline set by the Attorney Examiner's January 24, 2014 Entry in this proceeding. Therefore, APJN's intervention in these proceedings should be granted.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support was served electronically on these parties on this 4th day of February 2014.

/s/ Michael R. Smalz  
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Summary: Motion Appalachian Peace and Justice Network's Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael R. Smalz on behalf of Appalachian Peace and Justice Network