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BEFORE RECEIVED-DOCKETING DIV
 THE PUBLIC UTILITIES COMMISSION OF OHIO
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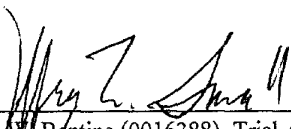
In the Matter of the Application of)
 Columbus Southern Power Company for) Case No. 99-1729-EL-ETP
 Approval of Electric Transition Plan and)
 Application for Receipt of Transition Revenues)

In the Matter of the Application of)
 Ohio Power Company for) Case No. 99-1730-EL-ETP
 Approval of Electric Transition Plan and)
 Application for Receipt of Transition Revenues)

MOTION TO INTERVENE OF THE OHIO
 COUNCIL OF RETAIL MERCHANTS

Now comes the Ohio Council of Retail Merchants (hereinafter "OCRM"), and, pursuant to Section 4901-1-11 O.A.C., respectfully moves to intervene in the above captioned proceedings for the reasons set forth in the following Memorandum in Support.

Respectfully submitted,



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 Technician Donna McKinn Date Processed Jan 5, 2000

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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MEMORANDUM IN SUPPORT
OF THE OHIO COUNCIL OF RETAIL MERCHANT'S
MOTION TO INTERVENE

In support of its Motion to Intervene in these proceedings, the OCRM states that it is a state-wide trade association representing over 3,000 companies including large department stores, supermarkets, chain drug stores, and independently owned retail businesses that sell furniture, appliances, clothing, shoes and other goods. Many of the OCRM's members are customers of the Columbus Southern and Ohio Power Companies. The OCRM deals with a wide range of issues affecting retailing, including the reliable and economic supply of utility services to its members. A principal concern of the organization is furthering the competitiveness of Ohio retailers.

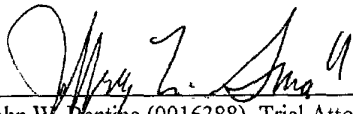
The OCRM was active in its support for electric restructuring legislation in Ohio. Since passage of S.B. 3 by the General Assembly, the OCRM has monitored events at the Commission relating to the electric restructuring legislation such as the workshops that have been conducted by the Commission Staff and the filing of the above captioned case. On its own part and in conjunction with other parties who have expressed a keen interest in electric restructuring in Ohio, the OCRM has filed multiple sets of comments concerning proposed rules that are required under the electric restructuring legislation. The OCRM has been a party to rate case, merger,

conjunctive electric service, and other cases before the Commission, and the OCRM expects to continue the involvement that it has shown before the General Assembly on the deregulation of electric generation service in hearings to be conducted over the filings of the other investor-owned electric utilities in Ohio. This case is an important bridge between the legislative promise of a competitive supply of generation services and the actual development of competitive markets for the supply of generation services in areas served by the Columbus Southern and Ohio Power Companies. The OCRM seeks to intervene in this case to offer the perspective of commercial customers regarding the applications under consideration.

As a result of the foregoing, the OCRM has a real and substantial interest in the Columbus Southern and Ohio Power filings that is not represented by any existing party. The OCRM's participation will contribute to a just resolution of the serious issues involved in these proceedings and will not cause undue delay. No party will be unjustly prejudiced by the OCRM's intervention.

WHEREFORE, the OCRM respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,

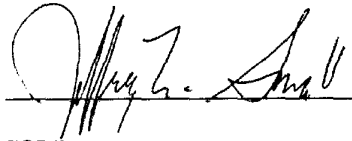


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Attorney for the Ohio Council
of Retail Merchants

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support* was served upon counsel for all other parties of record, by regular U.S. mail, postage prepaid, this 3rd day of January, 2000.



A handwritten signature in black ink, appearing to read "Jeffrey L. Smith", is written over a horizontal line.

PARTIES OF RECORD

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