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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**PUCO**

In the Matter of the Application of )  
Columbus Southern Power Co. )  
For Approval of Electric Transition Plan )

Case No. 99-1729-EL-ETP

**MOTION OF PP&L ENERGY PLUS CO., LLC  
TO INTERVENE**

Pursuant to Ohio Revised Code ("R.C.") Section 4903.22.1 and Ohio Administrative Code ("OAC") Rule 4901-1-11, PP&L EnergyPlus Co., LLC ("EnergyPlus"), hereby moves to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant EnergyPlus leave to intervene because EnergyPlus has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect EnergyPlus' ability to protect its interests. Reasons which support EnergyPlus' Motion are addressed below.

**MEMORANDUM IN SUPPORT**

EnergyPlus is a wholly owned subsidiary of PP&L, Inc. and is licensed as a retail electricity supplier in the states of Pennsylvania, New Jersey, Delaware Montana, and Maine and serves a significant amount of retail electric load in Pennsylvania. As such, EnergyPlus is knowledgeable and experienced in competitive energy supply and serving retail customers in competitive markets and has been an active marketer since the inception of the Pennsylvania Customer Choice Pilot Program in 1997. EnergyPlus has compelling interests in the development of a robust competitive electric market in the Columbus Southern Power Co. service area in which EnergyPlus plans to participate. EnergyPlus has business interests and business plans which are unique to it in entering and competing in the service area of Columbus Southern Power Co. Issues relevant to EnergyPlus' interests will be determined in this matter

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and no other party to this proceeding would adequately represent EnergyPlus' unique interests.

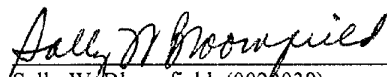
Therefore, it is vital to those interests that EnergyPlus be permitted to intervene.

Service of pleadings and all proceedings in this matter should be made upon:

1. Sally W. Bloomfield  
BRICKER & ECKLER LLP  
100 South Third Street  
Columbus, Ohio 43215-4291; and
2. Daniel V. Gulino  
Counsel for PP&L EnergyPlus Co., LLC  
Two North Ninth Street  
Allentown, PA 18101

WHEREFORE EnergyPlus moves the Commission to grant its Motion to Intervene.

Respectfully submitted on behalf of  
PP&L EnergyPlus Co., LLC

  
\_\_\_\_\_  
Sally W. Bloomfield (0022038)  
Elizabeth H. Watts (0031092)  
Amy Straker Bartemes (0062288)  
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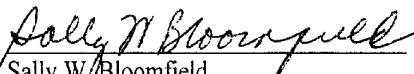
and

Daniel V. Gulino  
Counsel for PP&L EnergyPlus Co., LLC  
Two North Ninth Street  
Allentown, PA 18101  
(610) 774-5013

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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing Motion of PP&L EnergyPlus Co., LLC to Intervene was served upon the parties listed on the attached Service List by regular U.S. Mail, postage prepaid, this 7<sup>th</sup> day of February, 2000.

  
Sally W. Bloomfield

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