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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company for Approval of an Electric Transition Plan and Application for Receipt of Transition Revenues.)	Case No. 99-1729-EL-ETP
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)	

In the Matter of the Ohio Power Company for Approval of Electric Transition Plan and Application for Receipt of Transition Revenues.)	Case No. 99-1730-EL-ETP
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MOTION TO INTERVENE
OF THE OHIO MANUFACTURERS' ASSOCIATION

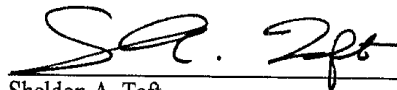
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Now comes the Ohio Manufacturers' Association (the "OMA") through its attorneys, which respectfully moves to intervene in these matters pursuant to §4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. As a trade association of over 2,500 member manufacturing companies in Ohio, the OMA has a real and substantial interest in the December 30, 1999 electric transition plans and applications for receipt of transition revenues of Columbus Southern Power Company and Ohio Power Company. The OMA's members are consumers of large quantities of electricity. The intervention by the OMA will not unduly prolong or delay these proceedings and the OMA will significantly contribute to the full development in equitable resolution of the factual issues in these cases. A Memorandum in Support is attached.

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Technician *[Signature]* - Date Processed *Jan 7, 2000*

WHEREFORE, the Ohio Manufacturers' Association respectfully moves that the Commission grant its Motion to Intervene and allow it to participate in these proceedings as an intervenor.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Section 4903.221(B), Revised Code, requires the Commission to consider the following criteria in ruling upon Motions to Intervene:

- (1) the nature and extent of the prospective intervenor's interest;
- (2) the legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; and
- (4) whether the prospective intervenor will significantly contribute to full development in equitable resolution of the factual issues.

Similarly, Rule 4901-1-11(B) of the Ohio Administrative Code allows the Commission, the legal director, the deputy legal director, or the attorney examiner to consider the following in determining whether that person has shown the existence of a real and substantial interest in the proceeding:

- (1) the nature of the person's interest;
- (2) the extent to which the person's interest is represented by existing parties;
- (3) the person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and
- (4) whether granting the request of the intervention would unduly delay the proceeding or unjustly prejudice any existing party.

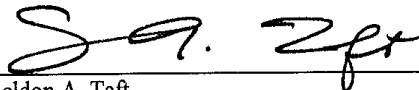
On December 30, 1999, Columbus Southern Power Company and Ohio Power Company filed their electric transition plans and applications to receive transition revenues in these cases.

The OMA is an association of over 2,500 manufacturing companies in Ohio. Many of these manufacturing companies purchase electric service from Columbus Southern Power Company and Ohio Power Company and are otherwise unrepresented in this proceeding. The purchase of electricity represents a substantial and significant expense in the manufacturing process. The OMA and its members have a real and substantial interest in all elements of the Columbus Southern Power Company and Ohio Power electric transition plans. The OMA has an interest in seeing that there are viable competitive options in electricity in Ohio in 2001.

The OMA will not unduly prolong or delay the proceedings. It will comply with all of the statutory and commission prescribed deadlines. Finally, the OMA will actively participate and will significantly contribute to full development and equitable resolution of the factual issues throughout the hearings in these proceedings.

WHEREFORE, the OMA has demonstrated that it has a real and substantial interest in these proceedings and respectfully requests that its Motion to Intervene in the above-styled proceedings be granted.

Respectfully submitted,



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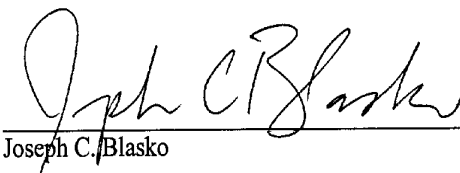
CERTIFICATE OF SERVICE

I certify that the foregoing Motion to Intervene was served upon the following persons either via facsimile, hand delivery, or U.S. first class mail, postage prepaid, this 6th day of January, 2000:

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