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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbus Southern Power Company and)
Ohio Power Company for Authority to)
Recover Costs Associated with the)
Construction and Ultimate Operation of an)
Integrated Gasification Combined Cycle)
Electric Generation Facility.)

Case No. 05-376-EL-UNC

MOTION TO INTERVENE OF CALPINE CORPORATION

On March 18, 2005, the Columbus Southern Power Company and the Ohio Power Company (hereinafter "AEP") filed its Application ("Application") in Case No. 05-376-EL-UNC with the Public Utilities Commission of Ohio ("Commission") for authority to recover costs associated with the construction and ultimate operation of an integrated gasification combined cycle ("IGCC") electric generation facility. Pursuant to Ohio Revised Code Section 4903.221 and Rule 4901-1-11 of the Ohio Administrative Code, Calpine Corporation ("Calpine") hereby moves to intervene in this proceeding.

WHEREFORE, for the reasons set out in the attached Memorandum in Support of Motion to Intervene, Calpine respectfully requests that this Motion to Intervene be granted.

Respectfully Submitted,

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MEMORANDUM OF SUPPORT

Ohio Administrative Code (“OAC”) Rule 4901-1-11 provides generally that a timely motion to intervene will be granted upon a showing that the intervenor “has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.” OAC Rule 4901-1-11(A)(2). Among the factors to be considered relative to a motion to intervene are (i) the nature of the intervenor’s interest; (ii) the extent to which the intervenor’s interests are represented by existing parties; (iii) the intervenor’s contribution to a just and expeditious resolution of the proceeding; and (iv) whether granting the intervention would unduly delay the proceeding or unjustly prejudice any existing party. OAC Rule 4901-1-11(B); see also Ohio Revised Code Section 4903.221(B). The requested intervention of Calpine meets these criteria and therefore should be granted.

Calpine is a publicly traded competitive power supplier. Through its subsidiaries, Calpine builds, owns and operates power generation assets in various geographical areas of the U.S., including the Midwest, and provides reliable, competitively priced electricity from environmentally responsible facilities. Calpine’s U.S. operating portfolio encompasses over 20,000 megawatts, making it one of the largest power producers, independent or otherwise, in the nation. Additionally, Calpine’s 700-megawatt Fremont Energy Center, located in Sandusky County, Ohio, is currently under construction. The primary focus of Calpine’s business is the provision of wholesale electricity to distribution utilities. Calpine will therefore be directly impacted by any action taken by the Commission in this proceeding. Therefore, the Commission should grant leave to intervene because Calpine has a real and substantial interest that is not represented by another party to this proceeding. Additionally, Calpine’s participation in this

proceeding will contribute to a just and expeditious resolution of the issues and will not unduly delay the proceeding or unjustly prejudice any party.

WHEREFORE, for the reasons set out above, Calpine respectfully requests that it be permitted to intervene in the above-captioned proceedings and be made a party for all purposes.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record indicated on the attached service list this 18th day of April, 2005, via U.S. mail, postage prepaid.

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