

IN THE SUPREME COURT OF OHIO

<p>The Office of the Ohio Consumers' Counsel, Appellant,</p> <p style="text-align: center;">v.</p> <p>The Public Utilities Commission of Ohio, Appellee,</p>	<p>: : Supreme Court Case No. 09-2022 : : : Appeal From the Public : Utilities Commission of Ohio : Case Nos. 08-917-EL-SSO and : 08-918-EL-SSO</p>
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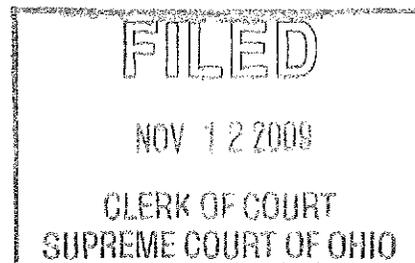
COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S
MOTION TO INTERVENE

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Columbus Southern Power Company and
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IN THE SUPREME COURT OF OHIO

The Office of the Ohio Consumers' Counsel,	:	
Appellant,	:	Supreme Court Case No. 09-2022
	:	
	:	
	:	Appeal From the Public
v.	:	Utilities Commission of Ohio
The Public Utilities Commission of Ohio,	:	Case Nos. 08-917-EL-SSO and
Appellee,	:	08-918-EL-SSO

**COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S
MOTION TO INTERVENE**

Columbus Southern Power Company and Ohio Power Company, both of which are electric utility operating companies and members of the American Electric Power electric utility system (“AEP Ohio”), move to intervene as Appellees in this proceeding. For the reasons discussed in the following memorandum: 1) AEP Ohio has an interest relating to the matters that are the subject of this action; 2) the disposition of the action may impair or impede AEP Ohio’s ability to protect that interest; and 3) that interest is not adequately represented by existing parties.

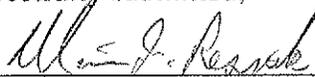
MEMORANDUM IN SUPPORT

This appeal involves the effect of orders issued by the Public Utilities Commission of Ohio (Commission), in its Case Nos. 08-917-EL-SSO and 08-918-EL-SSO. Those cases involve the application of AEP Ohio for approval of each Companies’ Electric Security Plan, their Corporate Separation Plan and, for Columbus Southern Power Company, authority to sell or transfer certain generating assets.

The appeal seeks to overturn certain portions of the Commission's orders in these cases so as to achieve a result that would be contrary to AEP Ohio's interest. Therefore, AEP Ohio has a direct interest in the matters that are the subject of these appeals. Absent granting intervention, AEP Ohio's ability to protect this interest may be impaired or impeded, and the Court will not have the benefit of hearing from the companies whose rates are at issue in this appeal.

Finally, neither the Appellant nor the Appellee can adequately represent AEP Ohio's interests in this regard. Therefore, AEP Ohio requests that the Court grant this motion to intervene.

Respectfully submitted,



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PROOF OF SERVICE

I certify that Columbus Southern Power Company's and Ohio Power Company's Motion to Intervene was served by First-Class U.S. Mail upon counsel identified below for all parties of record this 12th day of November, 2009.



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