**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the :

Dayton Power and Light Company for an : Case No. 15-1830-EL-AIR

Increase in its Electric Distribution Rates :

In the Matter of the Application of the :

Dayton Power and Light Company for : Case No. 15-1831-EL-AAM

Accounting Authority :

In the Matter of the Application of Dayton :

Power and Light Company for Approval of : Case No. 15-1832-EL-ATA

Revised Tariffs :

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**Motion to Intervene and memorandum in support of Industrial Energy Users-Ohio**

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Frank P. Darr (Reg. No. 0025469)

(Counsel of Record)

Matthew R. Pritchard

(Reg. No. 0088070)

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

fdarr@mwncmh.com

mpritchard@mwncmh.com

**November 9, 2015 Attorneys for Industrial Energy Users-Ohio**

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**Motion to Intervene \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Industrial Energy Users-Ohio (“IEU-Ohio”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”), pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters (“Proceeding”) with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On October 30, 2015, the Dayton Power and Light Company (“DP&L”) filed a notice of intent to file an application for an increase in rates.

IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the Proceeding, and is so situated that the disposition of this Proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this Proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the Proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the Proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

*/s/ Frank P. Darr*

Frank P. Darr (Reg. No. 0025469)

(Counsel of Record)

Matthew R. Pritchard (Reg. No. 0088070)

McNees Wallace & Nurick LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

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Telecopier: (614) 469-4653

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**Memorandum in support \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

In support of this Motion to Intervene, Industrial Energy Users-Ohio (“IEU-Ohio”) states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member\_list.aspx. IEU-Ohio’s members purchase substantial amounts of electric and related services from Ohio’s Electric Distribution Utilities (“EDU”), including DP&L. IEU-Ohio’s members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to SB 221, and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this Proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members’ manufacturing facilities. Specifically, IEU-Ohio’s direct interest in this Proceeding is the result of the effect that this Proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

*/s/ Frank P. Darr*

Frank P. Darr (Reg. No. 0025469)

(Counsel of Record)

Matthew R. Pritchard

(Reg. No. 0088070)

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21 East State Street, 17TH Floor

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fdarr@mwncmh.com

mpritchard@mwncmh.com

Attorneys for Industrial Energy Users-Ohio

**Certificate of Service**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e‑filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio, to the following parties of record this 9th day of November 2015, *via* electronic transmission.

*/s/ Frank P. Darr*

Frank P. Darr

Michael J. Schuler (0082390)

The Dayton Power and Light Company

1065 Woodman Drive

Dayton, OH 45432

Telephone: (937) 259-7358

Telecopier: (937) 259-7178

michael.schuler@aes.com

Charles J. Faruki (0010417)

(Counsel of Record)

D. Jeffrey Ireland (0010443)

Jeffrey S. Sharkey (0067892)

Faruki Ireland & Cox P.L.L.

500 Courthouse Plaza, S.W.

10 North Ludlow Street

Dayton, OH 45402

Telephone: (937) 227-3700

Telecopier: (937) 227-3717)

cfaruki@ficlaw.com

djireland@ficlaw.com

jsharkey@ficlaw.com

**On Behalf of The Dayton Power and Light Company**