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THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Adoption of a)
Portfolio Plan Template for Electric) Case No. 09-714-EL-UNC
Utility Energy Efficiency and Peak-)
Demand Reduction Programs.)

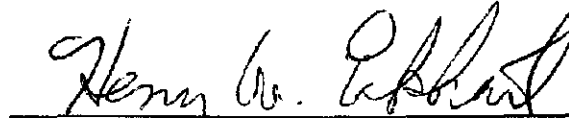
PUCO

MOTION TO INTERVENE
BY
THE NATURAL RESOURCES DEFENSE COUNCIL

The Natural Resources Defense Council ("NRDC") moves to intervene in this case in which the Public Utilities Commission of Ohio ("Commission" or "PUCO") has requested comments from interested parties on the development of a template for the electric utilities' energy efficiency and peak-demand reduction program portfolio plans. The reasons the PUCO should grant NRDC's Motion to Intervene ("Motion") are further set forth in the attached Memorandum in Support.

Respectfully submitted,

HENRY W. ECKHART (0020202)
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of a)	
Portfolio Plan Template for Electric)	Case No. 09-714-EL-UNC
Utility Energy Efficiency and Peak-)	
Demand Reduction Programs.)	

MEMORANDUM IN SUPPORT

This case involves the implementation of S.B. 221 and the requirement in Ohio Adm. Code 4901:1-39-04 that electric utilities must develop an energy efficiency and peak-demand reduction program. As part of the Commission's June 17, 2009 Entry on Rehearing addressing the energy efficiency and peak-demand reduction programs of the electric utilities, the Commission stated that the PUCO Staff would develop a template for the utilities' program portfolio plan.¹ The Commission also ordered that the PUCO Staff allow all interested parties the opportunity to comment on the Staff's draft.²

In support of this Motion to Intervene The Natural Resources Defense Council ("NRDC") states that it is a non-profit environmental organization with over 30 years experience working on state energy policy, including utility regulation and energy efficiency. NRDC has a strong historical interest in ensuring that Ohio adopts environmentally sound and sustainable energy policies, and has been involved in the implementation of S.B. 221.

¹ See Entry at 7-8 (June 17, 2009)

² See Id.

NRDC and its 12,600 members who live in Ohio are interested in promoting energy efficiency and peak demand reduction to meet Ohio's energy needs. NRDC's experience in implementing energy efficiency has ingrained the importance of information sharing among interested stakeholders. This common understanding will be facilitated by the template Staff created.

NRDC seeks to intervene in this proceeding in order that its members and others can benefit from optimally designed and cost-effective energy efficiency programs. NRDC will bring significant expertise to bear in these proceedings. The Staff of NRDC have extensive history with the design and implementation of utilities programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public.

NRDC has intervened and/or provided testimony on these issues in similar proceedings in a number of states including Illinois, Wisconsin, New York, Oregon, California, New Jersey, and Iowa, to name a few. NRDC has also been granted intervention in numerous cases before the Public Utilities Commission of Ohio.

NRDC has regularly presented testimony before the U. S. Congress and various state legislatures related to the electric utility industry use of energy efficiency resources, utility rate design, utility planning and other topics relevant to this proceeding.

Many of the Ohio NRDC members are served by the electric companies that are the applicants in this case. The NRDC has a real and substantial interest in these proceedings as they may directly or indirectly impact the environment of the State of Ohio, and other areas of the United States, and the electric bills of its members in the Applicant's service area.

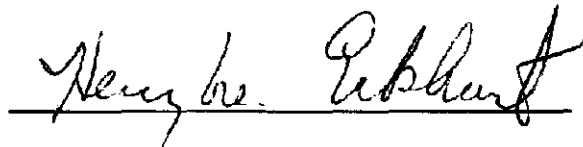
Intervention of NRDC will not unduly prolong or delay the proceeding.

Intervention of NRDC will significantly contribute to the full development of the record in this proceeding.

WHEREFORE, The Natural Resources Defense Council respectfully requests that its Motion to Intervene be granted in full as aforesaid.

Respectfully submitted,

HENRY W. ECKHART (0020202)
COUNSEL FOR THE NATURAL
RESOURCES DEFENSE COUNCIL

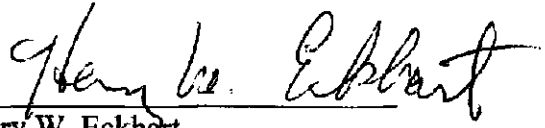
A handwritten signature in cursive script, reading "Henry W. Eckhart", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this *Motion to Intervene* was served on the persons stated below by regular U.S. Mail, postage prepaid, on this 14th day of September 2009.


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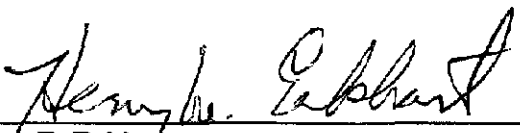
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