

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Ohio-American Water Company to Increase) Case No. 11-4161-WS-AIR
its Rates for Water and Sewer Service.)

**MOTION TO INTERVENE OF
PERRY TOWNSHIP, FRANKLIN COUNTY, OHIO**

The Board of Trustees of Perry Township, Franklin County, Ohio (the "Township") hereby respectfully moves the Public Utilities Commission of Ohio (the "Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code, for leave to intervene in the above-captioned matters, concerning an application for an increase in rates for water service filed by the Ohio-American Water Company ("Ohio-American"). The Township requests that the Commission grant the Township the full powers and rights available to intervening parties.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, the Township has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede their ability to protect those interests.

The Township believes that its participation in the proceedings will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in the proceedings. The interests of the Township and its residents will not be adequately represented by other parties to the proceedings and, as such, the Township is entitled to intervene in both proceedings with the full powers and

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rights granted, by the Commission specifically, by statute and by the Ohio Administrative Code,
to intervening parties.

Respectfully submitted,

By



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*Special Counsel for Perry Township,
Franklin County, Ohio*

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, the Township states that its citizens are customers of Ohio-American, a public utility subject to the jurisdiction of the Commission. The Township is also a political subdivision and seeks to promote the interests of its citizens. The Township informally participated in the last Ohio-American rate increase proceedings because of the influence that rates and charges for water and sewer service can have upon the Township's local economy and citizens.

Due to the probable impact that a rate increase will have upon the residents of the Township, the Township has a real and substantial interest in these proceedings. Furthermore, the disposition of the proceedings may, as a practical matter, impair or impede the Township's abilities to protect its interests.

For the aforementioned reasons, the Township has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding that will only be protected by its participation in the proceedings. Therefore, the Township hereby requests the

Commission grant this Motion to Intervene with the full powers and rights granted, by the Commission specifically, by statute and by the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

By



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon the following parties of record this 27th day of October, 2011 via ordinary U.S. mail:

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