

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of its Market Rate Offer.)	
)	Case No. 12-426-EL-SSO
)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.)	
)	Case No. 12-427-EL-ATA
)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.)	
)	Case No. 12-428-EL-AAM
)	
In the Matter of the Application of The Dayton Power and Light Company for Waiver of Certain Commission Rules.)	
)	Case No. 12-429-EL-WVR
)	
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders.)	
)	Case No. 12-672-EL-RDR

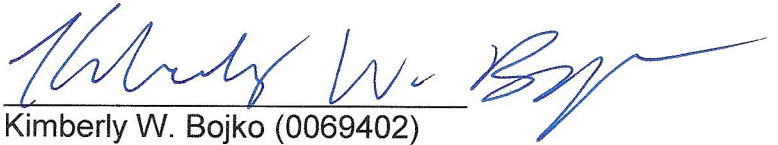
**MOTION TO INTERVENE OF
SOLARVISION, LLC**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, SolarVision, LLC (SolarVision) hereby respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in the above-captioned matter with the full powers and rights granted to intervening parties.

As demonstrated further in the attached Memorandum in Support, SolarVision has a real and substantial interest in this proceeding, which may be adversely affected by the outcome of this proceeding and which cannot be adequately represented by any existing parties. Accordingly, SolarVision satisfies the standard for intervention set forth in the Commission's rules and by statute.

WHEREFORE, SolarVision respectfully requests that the Commission grant this motion for leave to intervene and that SolarVision be made a full party of record.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Kimberly W. Bojko", is written over a horizontal line.

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MEMORANDUM IN SUPPORT

On March 30, 2012, The Dayton Power and Light Company (DP&L) filed a proposed market rate offer (MRO) that would, among other matters, establish standard service offer (SSO) rates during the rate plan period in the form of a blended rate. DP&L is proposing to proportionately blend the rate resulting from a competitive bidding process (CBP) with DP&L's current SSO generation prices. DP&L is also proposing to require the winning bidders of the CBP to supply renewable energy or renewable energy credits (RECs) sufficient to meet the Ohio renewable portfolio standards (RPS) for the load associated with that which the winning bidder will supply for a three-year period subsequent to the delivery year.

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-captioned proceeding. Section 4903.221, Revised Code, provides, in part, that any person “who may be adversely affected” by a Commission proceeding is entitled to seek intervention in that proceeding. Section 4903.221(B), Revised Code, further requires the Commission to consider the nature and extent of the prospective intervenor’s interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor’s potential contribution to a just and expeditious resolution of the issues involved.

Rule 4901-1-11, Ohio Administrative Code, permits intervention to a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede his ability to protect that interest and whose interest is not adequately represented by an existing party.

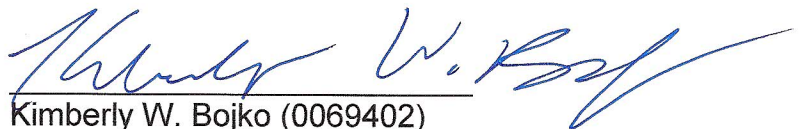
SolarVision is an Ohio-based solar company that, along with its subsidiaries, owns and operates multiple certified renewable energy resource generating facilities. As a provider of solar RECs and active participant in the Ohio solar REC competitive market, SolarVision has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. Given SolarVision’s unique expertise in this area, SolarVision will be able to assist in the development of a full and complete record in order to assist the Commission as it reviews DP&L’s application, particularly with regard to DP&L’s RPS requirements and the RPS requirements

associated with the load supplied by certified retail electric suppliers pursuant to DP&L's proposed rate blending plan and the proposal to include such in the CBP product. Accordingly, SolarVision's intervention will significantly contribute to the full development and equitable resolution of the factual issues in this proceeding, and SolarVision's interest will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

SolarVision satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, and is, therefore, authorized to intervene with the full powers and rights granted by the Commission to intervening parties.

WHEREFORE, SolarVision respectfully requests that the Commission grant this motion for leave to intervene and that SolarVision be made a full party of record.

Respectfully Submitted,

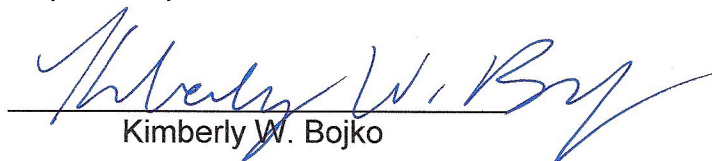


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 7th day of May, 2012 by electronic mail if available or by regular U.S. mail, postage prepaid, upon the persons listed below.


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Summary: Motion SolarVision LLC electronically filed by Mr. Jamie D Albert on behalf of SolarVision LLC