

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of	)	
the Dayton Power and Light Company	)	Cause No. 12-426-EL-SSO
Approval of its Market Offer	)	
	)	
In the matter of the Application of	)	
the Dayton Power and Light Company	)	Cause No. 12-427-EL-ATA
Approval of Revised Tariffs	)	
	)	
In the matter of the Application of	)	
the Dayton Power and Light Company	)	Cause No. 12-428-EL-AAM
Approval of Certain Accounting Authority	)	
	)	
In the matter of the Application of	)	
the Dayton Power and Light Company	)	Cause No. 12-429-EL-WVR
The Waiver of Certain Commission Rules	)	
	)	
In the matter of the Application of	)	
the Dayton Power and Light Company	)	Cause No. 12-627-EL-RDR
To Establish Tariff Riders	)	
	)	

**MOTION TO INTERVENE OF FEDERAL EXECUTIVE AGENCIES**

Pursuant to Rule 4901-1-11 of the Ohio Administrative Code and R. C. 4903.221 and Rule 4903.221, the Federal Executive Agencies (“FEA”) respectfully seeks leave to intervene in this proceeding. As set forth in the accompanying Memorandum in Support, FEA meets the requirements for intervention.

On March 30, 2012, Dayton Power and Light (“DP&L”) filed a request for approval to meet its Standard Service Offer (“SSO”) obligation, and for approval of revised tariffs, accounting authority, a waiver of certain Commission rules, and establishment of tariff riders. As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, FEA has a direct, real and substantial interest in the issues and matters involved in the above-

captioned proceeding, and its interests are not represented by other parties. FEA believes that its participation will not unduly prolong or delay this proceeding and that it will contribute to the just and expeditious resolution of the proceedings. The interest of FEA will not be adequately represented by other parties to the proceeding and, as such, FEA is entitled to intervene with the full powers and rights granted by the Commission.

Respectfully submitted,

/s/ Bill C. Wells

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Attorney for FEA

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**MEMORANDUM IN SUPPORT OF FEDERAL EXECUTIVE AGENCIES’  
MOTION TO INTERVENE**

In support of its Motion to Intervene in this proceeding, Federal Executive Agencies (“FEA”) avers that it is a large customer in Ohio, covering Wright-Patterson Air Force Base (“WPAFB”) and all federal agencies in the Dayton Power & Light (“DP&L”). WPAFB represents one of the largest electric consumers for DP&L.

FEA has a real and substantial interest in these proceedings as it will be directly impacted by the cost of electric service to FEA and its impact on the electric bills of all federal consumers in the service region. No other party to this proceeding will adequately represent the interests of FEA. FEA’s participation will contribute to these proceedings, and will not cause undue delay.

The test of intervention pursuant to Rule 4901-1-11 Ohio Administrative Code has been met, and, therefore, full intervention should be granted.

Major Christopher C. Thomson is pending Ohio Pro Hac Vice. Hew will be sponsored by Mr. Bill C. Wells. Mr. Wells is an Ohio attorney and can submit this motion for FEA.

WHEREFORE, FEA moves this Commission to grant it intervention in this proceeding.

Respectfully submitted,

/s/ Bill C. Wells

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/s/ Chris Thompson

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Attorney for FEA

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene was served on the persons stated below via electronic service, 12<sup>th</sup> day of December 2012.

/s/ Chris Thompson  
Christopher C. Thompson

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Summary: Legal Notice FEA intervention for Docket #12-426-EL-SSO electronically filed by Mr. Chris C Thompson on behalf of Federal Executive Agencies and Chris Thompson