

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company for Authority to	)	Case No. 13-2385-EL-SSO
Establish a Standard Service Offer	)	
Pursuant to §4928.143, Revised Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of	)	
Ohio Power Company for Approval of	)	Case No. 13-2386-EL-AAM
Certain Accounting Authority.	)	

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**OHIO PARTNERS FOR AFFORDABLE ENERGY'S  
MOTION TO INTERVENE  
AND MEMORANDUM IN SUPPORT**

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Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned cases pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

/s/ Colleen L. Mooney  
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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these applications pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced applications were made by Ohio Power Company for authority to establish a standard service offer in the form of an electric security plan and for approval of certain accounting authority.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in these matters.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low- and moderate-income Ohioans; as such, OPAE has a real and substantial interest in these applications which seek authority for a standard service offer in the form of an electric security plan and accounting

authority. Additionally, OPAE includes as members non-profit organizations located in Ohio Power Company's service area.<sup>1</sup> Moreover, many of OPAE's members are community action agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, community action is charged with advocating for low-income residents of their communities.

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income residential customers of Ohio Power Company. OPAE members are also non-residential ratepayers of Ohio Power Company. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of these applications. OPAE's primary interest in these cases is to protect the interests of low- and moderate-income Ohioans and OPAE members whose provision of electric service will be affected by these applications.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede OPAE's ability to protect its interests. No other party to the matters will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate for low-income residential consumers, service provider and nonprofit customer group. No other party represents this group of interests. OPAE's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these proceedings. Therefore, OPAE's intervention in these proceedings should be granted.

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<sup>1</sup> A list of OPAE members can be found on the website: [www.ohiopartners.org](http://www.ohiopartners.org).

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support was served electronically on these parties on this 13th day of January 2014.

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy