

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

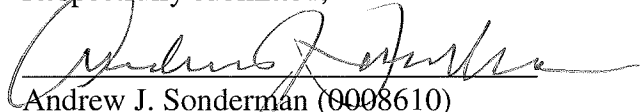
In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Company, and the Toledo Edison Company)	
for Authority to Provide for a Standard)	
Service Offer Pursuant to §4928.143,)	Case No. 14-1297-EL-SSO
Revised Code, in the Form of an Electric)	
Security Plan.)	

**MOTION TO INTERVENE BY HARDIN WIND LLC, CHAMPAIGN WIND LLC AND
BUCKEYE WIND LLC**

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221, Ohio Administrative Code ("OAC") Rule 4901-1-11, and the Attorney Examiner Entry dated August 29, 2014, Hardin Wind LLC ("Hardin"), Champaign Wind LLC ("Champaign") and Buckeye Wind LLC ("Buckeye"; collectively, "Joint Movants") move for leave to intervene in these proceedings. The reasons supporting this intervention are explained more thoroughly in the attached Memorandum in Support.

WHEREFORE, Joint Movants respectfully request that the Commission grant this motion for leave to intervene that they be made full parties of record.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

On August 4, 2014, Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (“collectively, “the Companies”) filed an Application to establish a standard service offer (“SSO”) in the form of an electric security plan (“ESP”). Joint Movants have a real and substantial interest in the above-captioned proceedings that may be affected materially by the Commission’s determination in these matters, and thus should be permitted to intervene to help ensure that a full, fair and adequate basis for decision is made of record.

Hardin is a Delaware limited liability company and a wholly-owned subsidiary of EverPower Wind Holdings, Inc. which develops, constructs, owns, and operates wind farms in four states. Hardin was granted a Certificate of environmental compatibility and public need to construct a wind-powered electric generation facility in Hardin County and by further Entry that certificate was extended to March 22, 2018.¹

Champaign is a Delaware limited liability company wholly-owned by EverPower Wind Holding, Inc. and was granted a certificate (subject to specified conditions) to construct a wind-powered electric generation facility in Champaign County, Ohio on May 28, 2013).²

Buckeye is a Delaware limited liability company wholly-owned by EverPower Wind Holding, Inc. On March 22, 2010 the Ohio Power Siting Board granted Buckeye a certificate to

¹ Case No.089-479-EL-BGN, *In the Matter of the Application of Hardin Wind Energy LLC for a Certificate to site a Wind-Powered Electric Generation Facility in Hardin County, Ohio*, (Entry, August 25, 2014).

² Case No. 12-160EL-BGN, *In the matter of the Application of Champaign Wind, LLC, for a Certificate to Construct a Wind-Powered Electric Generating Facility in Champaign County, Ohio* (Entry on Rehearing, September 30, 2013)

construct a wind-powered electric generation facility in Champaign County, Ohio.³ The Board granted an extension of Buckeye's certificate to May 28, 2018 by Entry on August 25, 2014.⁴

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, Joint Movants are real parties in interest in this proceeding. These interests include the effective and thorough and even-handed implementation of Am. Sub. SB 221, which enunciated and implemented state policy that electric utilities must acquire alternative and renewable energy for consumers in Ohio, including solar energy resources. See R.C. 4928.64. As providers of solar energy, Joint Movants have a clear and material interest in ensuring that this policy and the requirements of the Ohio Revised Code that solar energy play a role are met by the Companies in at the resolution of this proceeding.

The potential impacts of the Companies' Application on Joint Movants may be serious to the extent that coal-fired and nuclear generation stations potentially may be accorded an unwarranted preference over solar energy providers or receive an unjustified subsidy under the proposals presented in this case for an Economic Stability Program. The Commission's decision in this proceeding could have a significant effect on the viability of Joint Movants' operations in this state. It is submitted that no other party to this proceeding can adequately and completely protect Joint Movants' interests.

This Motion is being timely filed, meeting the deadline of October 1, 2014 established in the Attorney Examiner's Entry on August 29, 2014.

³ Case No. 08-666-EL-BGN, *In the Matter of the Application of Buckeye Wind, LLC for a Certificate to Construct Wind-powered Electric Generation Facilities in Champaign County, Ohio* (Rehearing granted in part and denied in part, July 15, 2010); *affirmed*, 127 Ohio St.3d 1464 (March 6, 2012).

⁴ Case No. 13-360-EL-BGA, *In the Matter of the Application of Buckeye Wind, LLC to Amend its Certificate Issued in Case No. 08-666-EL-BGN* (rehearing application filed, Sept. 24, 2014).

Joint Movants therefore respectfully request that the Commission grant the foregoing Motion for Leave to Intervene and that Hardin, Champaign and Buckeye be made full parties of record. The undersigned will accept electronic service of documents in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew J. Sonderman", written over a horizontal line.

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CERTIFICATE OF SERVICE

This certifies that a copy of the foregoing Motion to Intervene and Memorandum in Support was served via electronic mail, on this 1st day of October, 2014, upon the following:

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Case No(s). 14-1297-EL-SSO

Summary: Motion Motion to Intervene electronically filed by Mr. Andrew J Sonderman on behalf of Hardin Wind LLC and Champaign Wind LLC and Buckeye Wind LLC