

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Application)	
of Ohio Power Company and)	Case No. 14-2296-EL-EEC
Solvay Specialty Polymers for Approval)	
of a Special Arrangement Agreement)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF
INDUSTRIAL ENERGY USERS-OHIO**

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JANUARY 12, 2015

ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO

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MOTION TO INTERVENE

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On December 22, 2014, Solvay Specialty Polymers ("Solvay") and the Ohio Power Company ("AEP-Ohio") filed a joint application seeking approval of a special arrangement.¹ According to the Application, Solvay, a mercantile customer, is completing a combined heat and power project ("CHP") and would allow the CHP resources to count toward AEP-Ohio's compliance with energy efficiency benchmarks.² Additionally, AEP-Ohio is seeking to amend its portfolio plan to increase its compensation for "shared savings."

¹ Joint Application for Approval of a Special Arrangement Agreement Between Ohio Power Company and Solvay Specialty Polymers (Dec. 22, 2014) ("Application").

² *Id.* at 1-3.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Frank P. Darr

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, Industrial Energy Users-Ohio ("IEU-Ohio") states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's Electric Distribution Utilities ("EDU").

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to SB 221, and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the

electric supply and related services within Ohio. More specifically, AEP-Ohio is seeking to amend its portfolio plan to increase its compensation for “shared savings.” These additional charges would directly affect those members of IEU-Ohio that are not eligible to opt out of the amended portfolio plan on January 1, 2015. Contemporaneously, IEU-Ohio has filed comments and an objection regarding the Application that more fully sets out its concerns, and it hereby incorporates that filing by reference.

Respectfully submitted,

/s/ Frank P. Darr

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 12th day of January 2015, *via* electronic transmission.

/s/ Frank P. Darr

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ON BEHALF OF OHIO POWER COMPANY

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 14-2296-EL-EEC

Summary: Motion to Intervene of Industrial Energy Users-Ohio electronically filed by Mr. Frank P Darr on behalf of Industrial Energy Users-Ohio