

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Establish a)	Case No. 14-1158-EL-ATA
Meter Opt Out Tariff.)	

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

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matter pursuant to Revised Code §4903.221 and Rule 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum in support attached hereto and incorporated herein.

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this matter 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 matter concerns the application of Ohio Power Company (“Ohio Power”) to establish a meter opt out tariff.

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 this matter.

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 this proceeding, which will consider Ohio Power’s proposed meter opt out tariff.¹ 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.

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low income customers of Ohio Power. OPAE's primary interest in this case is to protect the interests of low and moderate income customers whose provision of electric service will be affected by this proceeding.

OPAE seeks to ensure that Ohio Power's meter opt out tariff is fair and reasonable. On March 23, 2015, a Stipulation and Recommendation was filed in this proceeding by Ohio Power, but only Ohio Power and the Staff of the Commission are parties to the Stipulation. No customer group is a party to the Stipulation. An attorney examiner's Entry dated March 26, 2015 set a procedural schedule. On April 24, 2015, testimony supporting the Stipulation was filed by Ohio Power and testimony opposing the Stipulation was filed by the Office of the Ohio Consumers' Counsel. A hearing is set for May 7, 2015.

Among the issues OPAE seeks to pursue in this proceeding is whether the Stipulation and Recommendation meets the Commission's three-part test for the reasonableness of stipulations. OPAE also seeks to question whether the proposed meter opt out tariff is reasonable and whether it should be approved. OPAE will also address any other issues that may arise during consideration of this matter.

Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income residential consumers. These consumers will be affected by the outcome of this proceeding.

For the above reasons, OPAE has a direct, real and substantial interest in this matter. The disposition of this matter may impair or impede OPAE's ability to protect its interests. No other party to the matter will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate and

service provider. No other party represents this group of interests. OPAE's participation in this matter 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 this proceeding.

Therefore, OPAE is entitled to intervene in this proceeding with the full powers and rights granted by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

Respectfully submitted,

/s/Colleen Mooney
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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 upon the following parties identified below on this 27th day of April 2015.

/c/Colleen Mooney
Colleen L. Mooney

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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