

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application Seeking)	
Approval of Ohio Power Company's Proposal)	
to Enter into an Affiliate Power Purchase)	Case No. 14-1693-EL-RDR
Agreement for Inclusion in the Power)	
Purchase Agreement Rider.)	Case No. 14-1694-EL-AAM
)	
In the Matter of the Application of Ohio)	
Power Company for Approval of Certain)	
Accounting Authority)	

**MOTION TO INTERVENE
OF
ENERNOC, INC.**

EnerNOC, Inc. ("EnerNOC") respectfully requests permission to intervene in the above-captioned cases.¹ EnerNOC provides demand response and energy efficiency programs to Ohio retail customers. EnerNOC has an interest in advocating for equal opportunities for demand response providers to participate in the procurement of electric services, including in the service territory of Ohio Power Company ("AEP").

The reasons the Public Utilities Commission of Ohio ("Commission") should grant EnerNOC's Motion are further set forth in the attached Memorandum in Support.

¹ EnerNOC's request is made pursuant to Ohio Revised Code §4903.221 and Ohio Adm. Code §4901-1-11.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

EnerNOC is a leading provider of cloud-based energy intelligence software (EIS) and services to thousands of enterprise customers and utilities globally. EnerNOC's EIS solutions for enterprise customers improve energy productivity by optimizing how they buy, how much they use, and when they use energy. EnerNOC's EIS solutions for utilities help maximize the value of demand-side resources, including fully outsourced and utility-managed demand response and energy efficiency programs that drive customer engagement.

EnerNOC's technology-enabled demand side response and energy management solutions help both customers and grid operators optimize the balance of electric supply and demand. EnerNOC is a leading provider of third-party demand response ("DR") and energy efficiency ("EE") programs on behalf of public agencies and electric and gas utilities. EnerNOC is currently managing over 24 GW of load sourced from over 14,000 commercial and industrial sites across markets in North America, Asia, Europe, Australia, and New Zealand, offering much of this load into energy, capacity, and ancillary services markets of varied designs.

This case may impact the opportunities for EnerNOC and customers of AEP to participate through curtailment service providers, like EnerNOC, in wholesale market demand side programs established by PJM Interconnection, LLC ("PJM"). EnerNOC provides EE and DR programs for utilities and has customers in the AEP service territory. Therefore, EnerNOC has a direct interest in, and may be adversely affected by, the outcome of this case. The opportunities offered by AEP as part of the power purchase agreement(s) at issue should not provide competitive advantages or competitive disadvantages to any party.

R.C. 4903.221 provides, in part, that any person "who may be adversely affected" by a PUCO proceeding is entitled to seek intervention in that proceeding. EnerNOC's interests may be adversely affected by this case because of offerings and the terms and conditions placed on the programs and/or agreements proposed by AEP. Therefore, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C. 4903.221(B) requires the Commission to consider the following criteria in ruling on motions to intervene:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding; and
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

First, the nature and extent of EnerNOC's interest is to provide demand response and energy efficiency services to the customers of AEP. This interest is different from that of any other party and especially different from that of the utility.

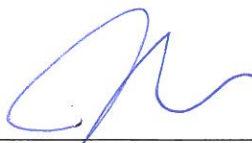
Second, EnerNOC's legal position relates to how demand response and energy efficiency services should be provided to Ohio retail customers. Ohio retail customers should be allowed to participate in any programs offered in Ohio and there should be no additional financial incentive for retail customers to participate in AEP's programs over others. This position is directly related to the merits of the case pending before the Commission.

Third, EnerNOC's intervention will not unduly prolong or delay the proceedings. EnerNOC's issues in this proceeding are narrow. In addition, EnerNOC has extensive experience practicing before the state and federal commissions. This will allow for the efficient processing of the case.

Fourth, EnerNOC's intervention will contribute to the full development and equitable resolution of the factual issues. EnerNOC has and will develop information that this Commission should consider for equitably and lawfully deciding the case in the public interest.

EnerNOC meets the criteria set forth in Ohio R.C. §4903.221, Ohio Adm. Code §4901-1-11, and the Commission should grant EnerNOC's Motion to Intervene.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on August 21, 2015.



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Summary: Motion To Intervene Of Enernoc, Inc. electronically filed by Mr. Joel E Sechler on behalf of EnerNOC, Inc.