

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the	:	
Dayton Power and Light Company for an	:	Case No. 15-1830-EL-AIR
Increase in its Electric Distribution Rates	:	
In the Matter of the Application of the	:	
Dayton Power and Light Company for	:	Case No. 15-1831-EL-AAM
Accounting Authority	:	
In the Matter of the Application of Dayton	:	
Power and Light Company for Approval of	:	Case No. 15-1832-EL-ATA
Revised Tariffs	:	

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

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NOVEMBER 9, 2015

**ATTORNEYS FOR INDUSTRIAL
ENERGY USERS-OHIO**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the	:	
Dayton Power and Light Company for an	:	Case No. 15-1830-EL-AIR
Increase in its Electric Distribution Rates	:	
In the Matter of the Application of the	:	
Dayton Power and Light Company for	:	Case No. 15-1831-EL-AAM
Accounting Authority	:	
In the Matter of the Application of Dayton	:	
Power and Light Company for Approval of	:	Case No. 15-1832-EL-ATA
Revised Tariffs	:	

MOTION TO INTERVENE

Industrial Energy Users-Ohio (“IEU-Ohio”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”), pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters (“Proceeding”) 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 October 30, 2015, the Dayton Power and Light Company (“DP&L”) filed a notice of intent to file an application for an increase in rates.

IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the 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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**ATTORNEYS FOR INDUSTRIAL ENERGY
USERS-OHIO**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Dayton Power and Light Company for an Increase in its Electric Distribution Rates	:	Case No. 15-1830-EL-AIR
In the Matter of the Application of the Dayton Power and Light Company for Accounting Authority	:	Case No. 15-1831-EL-AAM
In the Matter of the Application of Dayton Power and Light Company for Approval of Revised Tariffs	:	Case No. 15-1832-EL-ATA

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"), including DP&L. 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. Specifically, 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.

Respectfully submitted,

/s/ Frank P. Darr

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ENERGY USERS-OHIO**

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 and Memorandum in Support 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 9th day of November 2015, via electronic transmission.

/s/ Frank P. Darr

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**ON BEHALF OF THE DAYTON
POWER AND LIGHT COMPANY**

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM, 15-1832-EL-ATA

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