

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The )  
Dayton Power and Light Company to Increase ) Case No. 15-1830-EL-AIR  
its Rates for Electric Distribution. )

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 The )  
Dayton Power and Light Company for ) Case No. 15-1832-EL-ATA  
Approval of Revised Tariffs. )

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**MOTION TO INTERVENE OF  
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

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Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in this matter with the full powers and rights granted to intervening parties. OMAEG has a real and substantial interest that may be adversely affected by this proceeding and that interest cannot be adequately represented by any existing parties. Because OMAEG satisfies the standard for intervention set forth in the Commission's rules and by statute, the motion should be granted. A memorandum in support is attached.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. Bojko', is positioned above a horizontal line.

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**MEMORANDUM IN SUPPORT**

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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 its electric distribution rates.<sup>1</sup> On November 18, 2015, the Commission granted DP&L's request to waive certain filing requirements applicable to DP&L's generation and transmission services.<sup>2</sup> The Commission also ordered that the test period be from June 1, 2015 to May 30, 2016, and set the date certain as September 30, 2015.<sup>3</sup> As explained below, OMAEG has a real and substantial interest in the outcome of this proceeding.

Ohio Adm. Code 4901-1-11 permits intervention by a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede its ability to protect that interest and whose interest is not adequately represented by an existing party. Likewise, R.C. 4903.221 authorizes intervention where a party:

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<sup>1</sup> See DP&L's Application at 1 (October 30, 2015).

<sup>2</sup> See *In the Matter of the Application of The Dayton Power and Light Company to Increase its Rates for Electric Distribution, et al.*, Case No. 15-1830-EL-AIR, et al., Entry at 3 (November 18, 2015).

<sup>3</sup> Id.

may be adversely affected by the proceeding; will contribute to a full development and equitable resolution of factual issues; and will not unduly prolong or delay the proceedings.

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work directly with elected officials, regulatory agencies, the judiciary, and the media to provide education and information to energy consumers, regulatory boards and suppliers of energy; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. OMAEG members purchase electric distribution and related services from DP&L. Moreover, OMAEG has participated in other proceedings involving DP&L.<sup>4</sup>

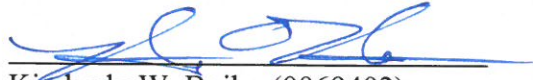
OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMAEG is regularly and actively involved in Commission proceedings and, as in previous proceedings, OMAEG's unique knowledge and perspective will contribute to the full development and equitable resolution of the factual issues in this proceeding. OMAEG's interest will not be adequately represented by other parties to the proceeding and its timely intervention will not unduly delay or prolong the proceeding.

Because OMAEG satisfies the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11, it is authorized to intervene with the full powers and rights granted by the Commission to intervening parties. OMAEG respectfully requests that the Commission grant this motion for leave to intervene and that OMAEG be made a full party of record.

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<sup>4</sup> See, e.g., *In the Matter of the Application of The Dayton Power and Light Company to Establish a Standard Service Offer in the Form of an Electric Security Plan, et al.*, Case No. 12-426-EL-SSO, et al., Opinion and Order at 5 (September 4, 2013).

Respectfully submitted,



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*Counsel for the OMAEG*



**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 November 25<sup>th</sup>, 2015.

  
Ryan P. O'Rourke

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Summary: Motion Motion To Intervene Of The Ohio Manufacturers' Association Energy Group  
electronically filed by Ms. Cheryl A Smith on behalf of The Ohio Manufacturers' Association