

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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**MOTION TO INTERVENE OF  
FEDERAL EXECUTIVE AGENCIES**

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Pursuant to Ohio Revised Code 4903.221 and Ohio Administrative Code 4901-1-11, Federal Executive Agencies (FEA) respectfully moves to intervene in the above captioned proceedings. As set forth in the accompanying Memorandum in Support, FEA meets the requirements for intervention.

On November 30, 2015, Dayton Power and Light (“DP&L”) filed with the Ohio Public Utilities Commission for a \$65.8M (30.3%) electric distribution base rate increase. Additionally, the company is proposing to establish various riders to recover costs associated with uncollectable expenses, regulatory compliance, and storm cost recovery. As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, FEA has a direct, real and substantial interest in the issues and matters involved in the above captioned proceeding, and its interest are not represented by other parties. FEA believe that its participation will not unduly prolong or delay this proceeding and that it will contribute to the just and expeditious resolution of the proceedings. The interest of FEA will not be adequately represented by other parties to the proceeding and, as such, FEA is entitled to intervene with the full powers and rights granted by the Commission.

Respectfully submitted,

/s/ Thomas A. Jernigan

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Ohio Atty #84008

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**MEMORANDUM IN SUPPORT OF FEDERAL EXECUTIVE AGENCIES’  
MOTION TO INTERVENE**

In support of its Motion to Intervene in this proceeding, Federal Executive Agencies (“FEA”) avers that it represents all federal agencies in the Dayton Power & Light (“DP&L”) servicing area including Wright-Patterson Air Force Base (“WPAFB”). WPAFB represents one of the largest electric consumers for DP&L.

FEA has a real and substantial interest in these proceedings as it will be directly impacted by the cost of the electric service to FEA and its impact on the electric bills of all federal consumers in the service region. No other party to this proceeding will adequately represent the interest of FEA. FEA’s participation will contribute to these proceedings, and will not cause undue delay. The test of intervention pursuant to Rule 4901-1-11 Ohio Administrative Code has been met, and therefore, full intervention should be granted.

WHEREFORE, FEA moves this Commission to grant it intervention in this proceeding.

/s/ Thomas A. Jernigan  
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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Intervene submitted on behalf of Federal Executive Agencies was served by electronic mail, upon the following Parties of Record on February 18, 2016

/s/ Thomas A. Jernigan

Thomas A. Jernigan

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Summary: Motion FEA Motion to Intervene electronically filed by Mrs. Ebony M Payton on behalf of Federal Executive Agencies