

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 16-395-EL-SSO
Approval of its Electric Security Plan.)

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 16-396-EL-ATA
Approval of Revised Tariffs.)

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 16-397-EL-AAM
Approval of Certain Accounting Authority)
Pursuant to Ohio Rev. Code § 4905.13.

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

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code (O.A.C.), the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves the Public Utilities Commission of Ohio (Commission) 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.

WHEREFORE, for the reasons stated more fully in the attached memorandum in support, OMAEG respectfully requests that the Commission grant its motion to intervene with the full powers and rights granted to the intervening parties.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

On February 22, 2016, the Dayton Power and Light Company (DP&L) filed an application seeking approval of its electric security plan (ESP).¹ The proposed term is for January 1, 2017 through December 31, 2026.² Among its many features, the ESP seeks to recover through a Reliable Electricity Rider (RER) the costs associated with several DP&L-owned generating units that will eventually be transferred to an unregulated generating affiliate (Ohio Genco).³ The ESP also seeks approval of, among other things, a Distribution Investment Rider (DIR), authority to recover deferred Ohio Valley Electric Corporation (OVEC) costs through the Reconciliation Rider (RR), and a Clean Energy Rider.⁴ As explained below, OMAEG has a real and substantial interest in the outcome of this proceeding.

¹ See DP&L's Application at 1 (February 22, 2016).

² Id.

³ Id. at 1-7.

⁴ Id. at 8-9.

Rule 4901-11, O.A.C., 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, Section 4903.221, Revised Code, authorizes intervention where a party: 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.⁵

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

⁵ 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).

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 Section 4903.221, Revised Code, and Rule 4901-1-11, O.A.C., 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 to intervene and that OMAEG be made a full party of record.

Respectfully submitted,



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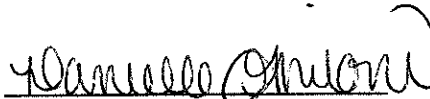
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Counsel for the OMAEG

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 March 16, 2016.


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Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Motion Motion to Intervene on Behalf of the Ohio Manufacturers' Association
Energy Group electronically filed by Ms. Danielle M Ghiloni on behalf of OMAEG