

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The     )  
Dayton Power and Light Company for     )  
Approval of its Electric Security Plan     )

Case No. 16-0395--EL-SSO

In the Matter of the Application of The     )  
Dayton Power and Light Company for     )  
Approval of Revised Tariffs.     )

Case No. 16-0396--EL-ATA

In the Matter of the Application of The     )  
Dayton Power and Light Company for     )  
Approval of Certain Accounting     )  
Authority Pursuant to Ohio Rev. Code     )  
§4905.13.

Case No. 16-0397--EL-AAM

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**EDGEMONT NEIGHBORHOOD COALITION'S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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The Edgemont Neighborhood Coalition ("Edgemont") respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to RC. §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

/s/Ellis Jacobs

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of its Electric Security Plan	)	Case No. 16-0395--EL-SSO
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	)	Case No. 16-0396--EL-ATA
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code §4905.13.	)	Case No. 16-0397--EL-AAM
	)	
	)	
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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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The Edgemont Neighborhood Coalition (“Edgemont”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The applications made by The Dayton Power and Light Company (“DP&L”) request approval of an Electric Security Plan, revised tariffs, and accounting authority.

The following criteria are to be considered in determining whether to permit intervention: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the

proceedings; and whether granting the intervention will unduly delay or unjustly prejudice any existing party.

Edgemont is a non-profit corporation based in a low income, African American neighborhood in Dayton, Ohio. The neighborhood is in the DP&L service territory. Edgemont works to expand economic and education opportunities and improve the quality of life for its members and all residents of the neighborhood. Access to affordable electric service is a large concern of Edgemont members. Edgemont also functions as a small business, operating an office, and community center. Edgemont has long been concerned with utility matters and for the past twenty years has actively participated in numerous cases before the PUCO, including cases involving DP&L.

Edgemont's primary interest in these matters is to protect the interests of low income customers of DP&L, including people who live in the Edgemont neighborhood, whose electric service will be affected by these applications. Further, Edgemont has been recognized by the Commission in the past as an advocate for low-income consumers.

For the above reasons, Edgemont has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede the ability of Edgemont to protect its interests. No other party will adequately represent the interests of Edgemont. Edgemont's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these matters.

Therefore, Edgemont is entitled to intervene in these matters with the full powers and rights granted by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

Respectfully submitted,

/s/Ellis Jacobs

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## **CERTIFICATE OF SERVICE**

A copy of the foregoing Motion to Intervene and Memorandum of Support will be served on this 9<sup>th</sup> day of May, 2016 by the Commission's e-filing system to these parties who have electronically subscribed to these cases.

/s/ Ellis Jacobs  
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Summary: Motion Edgemont Neighborhood Coalition's Motion to Intervene and Memorandum in Support electronically filed by Mr. Ellis Jacobs on behalf of Advocates for Basic Legal Equality and Jacobs, Ellis and Edgemont Neighborhood Coalition