

**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**

---

**UTILITY WORKERS UNION OF AMERICA, LOCAL 175'S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

---

Utility Workers Union of America, Local 175 ("Local 175") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to R.C. § 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations. The reasons for granting this Motion to Intervene are contained in the Memorandum set forth below.

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

Utility Workers Union of America, Local 175 ("Local 175") should be permitted to intervene in these matters pursuant to R. C. § 4903.221 and the Commission's Code of Rules and Regulations contained in 4901-1-11.

Local 175 is a tax exempt association representing a large number of the employees of the Dayton Power and Light Company ("DP&L") in both its distribution and generation services whose members will be affected by any decision rendered in this matter. The bargaining unit employees of DP&L represented by Local 175 are concerned about the potential impact any

decision reached in this matter will have on their current and future employment. Local 175 wants to make sure that the interests and rights of the bargaining unit employees its represents are properly heard, considered and protected throughout these proceedings. Local 175 has previously participated in cases before the PUCO involving DP&L.

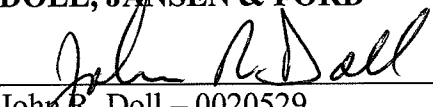
Local 175, as the sole and exclusive collective bargaining representative of a large number of the bargaining unit employees of DP&L, has a direct, real and substantial interest in these proceedings. Any decision rendered by the PUCO in this matter will undoubtedly have some effect on the current and future employment of the bargaining unit employees represented by Local 175. No other party can, or will, adequately represent the interest of the bargaining unit employees represented by Local 175 in this matter.

Additionally, the participation of Local 175, as a representative of the bargaining unit employees of DP&L, will not cause undo delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised in these proceedings.

Therefore, Local 175 is entitled to intervene in these matters with the full powers and rights granted by statute and by the Commission's Code of Rules and Regulations to intervening parties.

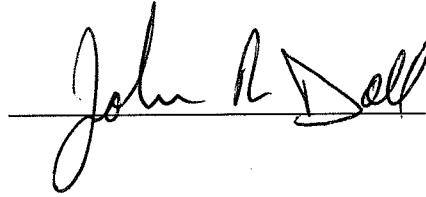
Respectfully submitted,

**DOLL, JANSEN & FORD**

  
John R. Doll - 0020529  
Matthew T. Crawford - 0089205  
111 W. First St., Suite 1100  
Dayton, OH 45402-1156  
(937) 461-5310, (937) 461-7219 (fax)  
jdoll@djflawfirm.com  
mcrawford@djflawfirm.com  
Attorneys for Utility Workers of America  
Local 175

**CERTIFICATE OF SERVICE**

A copy of the foregoing document was served upon the following individuals by electronic filing on this 14<sup>th</sup> day of June, 2016.

A handwritten signature in black ink, appearing to read "John R. Dell", is written over a horizontal line.

cfaruki@ficlaw.com  
djireland@ficlaw.com  
jsharkey@ficlaw.com  
mfleisher@elpc.org  
fdarr@mwncmh.com  
mpritchard@mwncmh.com  
jeffrey.mayes@monitoringanalytics.com  
evelyn.robinson@pjm.com  
schmidt@sppgrp.com  
dboehm@BKLawfirm.com  
mkurtz@BKLawfirm.com  
kboehm@BKLawfirm.com  
jkylercohn@BKLawfirm.com  
michelle.d.grant@dynegy.com  
joliker@igsenergy.com  
orourke@carpenterlipps.com  
bojko@carpenterlipps.com  
ghiloni@carpenterlipps.com  
mjsettineri@vorys.com  
smhoward@vorys.com  
glpetrucci@vorys.com  
ibatikov@vorys.com  
william.michael@occ.ohio.gov  
kevin.moore@occ.ohio.gov  
mdortch@kravitzllc.com  
tdougherty@theOEC.org  
cmooney@ohiopartners.org  
sechler@carpenterlipps.com  
gpoulos@enernoc.com  
rick.sites@ohiohospitals.org  
gthomas@gtpowergroup.com  
stheodore@epsa.org  
laurac@chappelleconsulting.net  
slesser@calfee.com  
jlang@calfee.com  
talexander@calfee.com  
tony.mendoza@sierraclub.org  
rsahli@columbus.rr.com  
mwarnock@bricker.com

dborchers@bricker.com  
ejacobs@ablelaw.org  
lhawrot@spilmanlaw.com  
dwilliamson@spilmanlaw.com  
charris@spilmanlaw.com  
amy.spiller@duke-energy.com  
elizabeth.watts@duke-energy.com  
william.wright@puc.state.oh.us  
Attorney Examiners:  
bryce.mckenney@puc.state.oh.us  
gregory.price@puc.state.oh.us

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**6/14/2016 9:31:54 AM**

**in**

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

Summary: Motion Motion to Intervene and Memorandum In Support electronically filed by Mr. John R. Doll on behalf of Utility Workers Union of America Local 175