

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Filing by Ohio Edison, )  
Company, The Cleveland Electric ) Case No. 16-481-EL-UNC  
Illuminating Company, and The Toledo )  
Edison Company of a Grid Modernization )  
Business Plan.

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

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Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code, 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. As 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,

/s/ Danielle Ghiloni Walter

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**MEMORANDUM IN SUPPORT**

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On February 29, 2016, the Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (collectively, the Companies) filed a grid modernization business plan (Plan) with the Public Utilities Commission of Ohio (Commission).<sup>1</sup> The Companies state that the Plan is filed as part of a commitment made in its fourth electric security plan proceeding<sup>2</sup> and is “an important step to advance and modernize the Companies’ electric distribution delivery system throughout their respective service territories.”<sup>3</sup> The Plan presents three scenarios for further consideration and utilizes various types of technology including Advanced Distribution Management System (ADMS), Advanced Metering Infrastructure (AMI), Integrated Volt/VAR Control (IVVC), and Distribution Automation (DA).<sup>4</sup> While the Plan fails to specify the expected costs to customers, the Companies state that costs incurred in implementing the Plan will be recovered through Rider AMI, which will be updated

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<sup>1</sup> Application at 1.

<sup>2</sup> Id.

<sup>3</sup> Id. at 3.

<sup>4</sup> Id., Ex. A at 5-13.

and reconciled on a quarterly basis.<sup>5</sup> Further, the Companies propose a return on equity of 10.38% with an additional 50 basis points.<sup>6</sup>

Rule 4901-1-1, Ohio Administrative Code, 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. Additionally, 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.

The Ohio Manufacturers' Association Energy Group (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 works 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 power services from the Companies, have previously participated in proceedings involving the Companies,<sup>7</sup> and will be affected by the Commission's determination in this proceeding.

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<sup>5</sup> Id., Ex. A at 15.

<sup>6</sup> Id.

<sup>7</sup> See e.g., *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of An Electric Security Plan*, Case No. 14-1297-EL-SSO (August 4, 2014); *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019*, Case No. 16-743-EL-POR (April 15, 2016).

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. It 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 Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code, 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.

Respectfully submitted,

/s/ Danielle Ghiloni Walter  
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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 August 5, 2016.

/s/Danielle Ghiloni Walter  
Danielle Ghiloni Walter

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Summary: Motion To Intervene Of The Ohio Manufacturers' Association Energy Group  
electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group