BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)		
Aqua Ohio, Inc.)		
		Case No.	16-0907-WW-AIR

MOTION TO INTERVENE BY THE CITY OF MARION

The City of Marion, Ohio hereby respectfully moves the Public Utilities

Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and

Rule 4901-1-11 of the Ohio Administrative Code, for leave to intervene in the abovecaptioned matters, concerning an application for an increase in rates for water service

filed by the Aqua Ohio, Inc. ("Aqua") May 31st, 2016. The City of Marion requests that
the commission grant the City the full powers and rights available to intervening parties.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, the City of Marion, Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede their ability to protect those interests.

The City believes that its participation in the proceedings will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in the proceedings. The interests of the City will not be adequately represented by other parties to the proceedings and, as such, the City is entitled to intervene in both proceedings with the full powers and rights

granted, by the Commission specifically, by statue and by the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

Mark D. Russell

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Attorney for the City of Marion, Ohio

August 16, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

MOTION TO INTERVENE					
In the Matter of the Application of) Aqua Ohio, Inc.)	Case No.	16-0907-WW-AIR			

BY THE CITY OF MARION

August 16, 2016

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Aqua Ohio, Inc.)	
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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, the City of Marion states that it, and its citizens, are customers of Aqua Ohio, Inc. a public utility subject to the jurisdiction of the Commission. The City of Marion is an Ohio Municipal Corporation and seeks to promote the interests of its citizens. The City has in previous cases been granted the right to intervene in Aqua's rate increase requests. Marion's participation in Aqua rate increase proceedings is significantly important given the cause and affect rates and charges for water and sewer service have upon the City as a customer of Aqua and upon the City's local economy and citizens. Given the fact that the previous intervention by the Ohio Consumers' Counsel and the City of Marion, Ohio, working with the P.U.C.O. staff, uncovered inappropriate items and unsubstantiated claims by Aqua or its predecessor in regard to the previous filings there is a real and present need to permit intervention in the current cause of action. It is reasonable to expect customers will be "adversely affected" by this case, especially if the customers were unrepresented in a proceeding where Aqua proposes to assess a significant and unjustified increase upon certain customers' monthly water bills. Finally, the disposition of the proceedings may, as a practical matter, impair or impede the City's abilities to protect its interests.

For the aforementioned reasons, the City has a direct, real, and substantial interest in the issues and matters involved, in the above-captioned proceeding that will only be protected by its participation in the proceedings. Therefore, the City of Marion, Ohio hereby requests the Commission grant this Motion to Intervene with the full powers and rights granted, by the Commission specifically, by statue and by the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

August 16, 2016

Mark D. Russell

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Attorney for the City of Marion, Ohio

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon the following parties of record this 16th day of August. 2016 via electronic transmission or fax transmission.

August 16, 2016

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Case No(s). 16-0907-WW-AIR

Summary: Motion Motion to Intervene by the City of Marion, Ohio electronically filed by Mr. Mark D Russell on behalf of City of Marion, Ohio