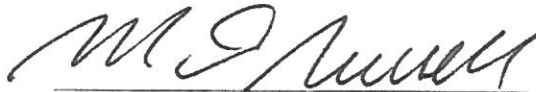


granted, by the Commission specifically, by statute and by the Ohio Administrative Code,
to intervening parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M D Russell", written over a horizontal line.

Mark D. Russell
Law Director -City of Marion, Ohio
233 W. Center St.
Marion, Ohio 43302
Tele.: (740) 387-3777
Fax: (740) 382-4921
law@marionohio.org

August 16, 2016

Attorney for the City of Marion, Ohio

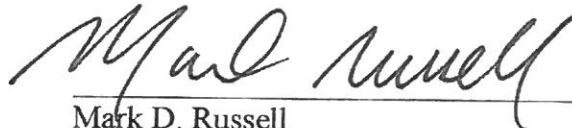
**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Aqua Ohio, Inc.)

Case No. 16-0907-WW-AIR

**MOTION TO INTERVENE
BY THE CITY OF MARION**

August 16, 2016



Mark D. Russell
Law Director -City of Marion, Ohio
233 W. Center St.
Marion, Ohio 43302
Tele.: (740) 387-3777
Fax: (740) 382-4921
law@marionohio.org

Attorney for the City of Marion, Ohio

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Aqua Ohio, Inc.)

Case No 16-0907-WW-AIR

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 statute and by the Ohio Administrative Code, to intervening parties.

Respectfully submitted,




Mark D. Russell
Law Director -City of Marion, Ohio
233 W. Center St.
Marion, Ohio 43302
Tele.: (740) 387-3777
Fax: (740) 382-4921
Law@marionohio.org

Attorney for the City of Marion, Ohio

August 16, 2016

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.



Mark D. Russell
Law Director -City of Marion, Ohio
233 W. Center St.
Marion, Ohio 43302
Tele.: (740) 387-3777
Fax: (740) 382-4921
Law@marionohio.org

August 16, 2016

Parties served:

Attorney for the City of Marion, Ohio

Steven Beeler Robert Eubanks
Public Utilities Section Office of Ohio Attorney General
30 East Broad Street, 16th Floor Columbus, Ohio 43215
steven.beeler@ohioattorneygeneral.gov
robert.eubanks@ohioattorneygeneral.gov

Kevin F. Moore Ajay Kumar
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800 Columbus, Ohio 43215-3485
kevin.moore@occ.ohio.gov
ajay.kumar@occ.ohio.gov

Glover, Rebekah J. Ms.
Whitt Sturtevant
88 E. Broad St Suite 1590
Columbus OH 43215
Phone: 937-417-3683
glover@whitt-sturtevant.com

Williams, Jamic Ms.
Ohio Consumers' Counsel
10 W. Broad Street
Columbus OH 43215
Phone: 614-466-9547

Hunter, Donielle M Ms.
PUCO
180 East Broad Street 11th Floor
Columbus OH 43215
Phone: 614-644-5954
Fax: 614-466-0313

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in

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