

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for Authority to)	Case No. 16-1852-EL-SSO
Establish a Standard Service Offer)	
Pursuant to R.C. 4928.143, in the)	
Form of an Electric Security Plan.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of)	Case No. 16-1853-EL-AAM
Certain Accounting Authority.)	

**MOTION TO INTERVENE
BY
OHIO PARTNERS FOR AFFORDABLE ENERGY**

Ohio Partners for Affordable Energy ("OPAE") moves to intervene in these proceedings considering the applications of Ohio Power Company for authority to establish a standard service offer in the form of an Electric Security Plan and for approval of certain accounting authority. The reasons why the Public Utilities Commission of Ohio ("Commission") should grant OPAE's motion to intervene are set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/Colleen L. Mooney
Colleen L. Mooney
Reg. No. 0015668
Ohio Partners for Affordable Energy
P.O. Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@ohiopartners.org
(electronically subscribed)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for Authority to)	Case No. 16-1852-EL-SSO
Establish a Standard Service Offer)	
Pursuant to R.C. 4928.143, in the)	
Form of an Electric Security Plan.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of)	Case No. 16-1853-EL-AAM
Certain Accounting Authority.)	

MEMORANDUM IN SUPPORT

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and Ohio Administrative Code Rule 4901-1-11. The above-referenced applications made by Ohio Power Company (“AEP Ohio”) seek authority to establish a standard service offer in the form of an Electric Security Plan (“ESP”) under R.C. 4928.143 and approval of certain accounting authority.

AEP Ohio filed an application to establish its current ESP in Case Nos. 13-2385-EL-SSO, et al., which the Commission modified and approved in an Opinion and Order issued on February 25, 2015. On October 3, 2014, AEP Ohio filed another application in Case Nos. 14-1693-EL-RDR, et al., in which the Commission’s March 31, 2016 Opinion and Order required AEP Ohio to file to extend and modify the ESP approved in Case No. 13-2385-EL-SSO, et al.

OPAE was granted intervention and participated in both of these prior AEP Ohio proceedings. On September 7, 2016, the Commission directed AEP Ohio to file its new ESP application and testimony in the above-captioned matters.

In determining whether to permit intervention, the following criteria are to be considered: 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 proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in these matters.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in these matters. Additionally, OPAE includes as members non-profit organizations that will be affected by the applications.¹ Many of OPAE's members are Community Action Agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, Community Action Agencies are charged with advocating for low-income residents of their communities.

OPAE's primary interest in these cases is to protect the interests of low and moderate income Ohioans and OPAE members whose provision of service will be affected by these applications. In addition to advocating for low and moderate income Ohioans, OPAE members serve a variety of roles in the provision of programs for low-income residential customers such as client intake, client counseling, consumer education services, emergency bill payment assistance, targeted energy efficiency services, and other functions related to program operations. Further, OPAE members are electric distribution customers of AEP Ohio and will be subject to any charges approved in these cases. OPAE has been recognized by the Commission in the past as an advocate for consumers and

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

particularly low-income consumers, all of whom will be affected by the outcome of these cases.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The matters will have an impact on the affordability of electric service for low-income households in AEP Ohio's service area. The disposition of these matters may impair or impede the ability of OPAE to protect its interests. No other party to the matters will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate for low-income residential customers, a service provider to low-income residential customers, and a non-profit, non-residential customer group. No other party represents this group of interests. OPAE'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 applications.

Therefore, OPAE 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,

Colleen L. Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
cmooney@ohiopartners.org
(electronically subscribed)

CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served electronically by the Commission's Docketing Division on parties who are electronically subscribed to these cases on this 27th day of October 2016.

/s/Colleen L. Mooney
Colleen L. Mooney

SERVICE LIST

stnourse@aep.com
mjsatterwhite@aep.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
William.Michael@occ.ohio.gov
Kevin.Moore@occ.ohio.gov
bojko@carpenterlipps.com
ghiloni@carpenterlipps.com
mfleisher@elpc.org
William.Wright@ohioattorneygeneral.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/27/2016 1:43:06 PM

in

Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy