

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for Authority to Establish a	)	
Standard Service Offer Pursuant to R.C.	)	Case No. 16-1852-EL-SSO
4928.143, in the Form of an Electric Security	)	
Plan.	)	
	)	
In the Matter of the Application of Ohio	)	
Power Company for Approval of Certain	)	Case No. 16-1853-EL-AAM
Accounting Authority.	)	

**MOTION TO INTERVENE  
OF  
RETAIL ENERGY SUPPLY ASSOCIATION**

In accordance with R.C. 4903.221 and Ohio Adm. Code 4901-1-11, the Retail Energy Supply Association (RESA) respectfully requests issuance of an order granting intervention in this proceeding. A Memorandum in Support follows.

**MEMORANDUM IN SUPPORT**

R.C. 4903.221 confers a right to intervene to any person who may be “adversely affected” by a Commission proceeding. In considering a request to intervene, the Commission must consider the nature of the intervenor’s interest, the extent that interest is represented by existing parties, the intervenor’s potential contribution to a just and expeditious resolution of the issues, and whether intervention would unduly delay the proceeding. *See* R.C. 4903.221(B)(1-4). *See also* Ohio Admin. Code 4901-1-11.

RESA meets all of the criteria for intervention. RESA is a non-profit 501(c)(6) organization headquartered in Harrisburg, Pennsylvania. Its member companies supply retail electricity and natural gas to residential, commercial, industrial, and governmental customers throughout the United States. In Ohio, RESA members serve customers throughout the state,

including the service territory of Ohio Power Company (AEP Ohio).<sup>1</sup> Since 2010, RESA has participated in most of the electric security plan proceedings before the Commission. RESA is (and has been) active in many other electric industry proceedings as well.

RESA's Ohio members have existing and potential business interests in AEP Ohio's service territory that will be affected by the outcome of this proceeding. These interests cannot be adequately represented by other parties. The Commission's decision in this matter will affect the viability of the competitive retail electric market in AEP Ohio's service territory, where RESA members provide electric power and other products and services to retail customers. RESA's participation in this proceeding will contribute to a just resolution of the issues affecting its members. The Commission has granted intervention to RESA in previous ESP proceedings. *See, e.g.*, Case Nos. 16-0395-EL-SSO, 14-1297-EL-SSO, 14-0841-EL-SSO, 13-2385-EL-SSO. The factors that warranted intervention in those proceedings are also present here.

Accordingly, RESA respectfully requests that the Commission grant this Motion to Intervene and that it be made a full party of record.

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<sup>1</sup> RESA's Ohio members are AEP Energy, APG&E, Calpine Energy Solutions, Champion Energy Services LLC, Constellation NewEnergy Inc, Crius, Direct Energy Services LLC, Dynegy, ENGIE Resources, IGS Energy, Just Energy, Liberty Power, NextEra Energy Services, Nordic Energy Services, LLC, NRG Energy Inc., Spark Energy, Starion Energy, and Stream Energy.

Dated: December 28, 2016

Respectfully submitted,

/s/ Mark A. Whitt

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ATTORNEYS FOR RETAIL ENERGY  
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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in

Support was served by electronic mail this 28th day of December, 2016 to the following:

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/s/ Rebekah J. Glover

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One of the Attorneys for Retail Energy Supply  
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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/28/2016 1:57:54 PM**

**in**

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

Summary: Motion to Intervene and Memorandum in Support electronically filed by Ms. Rebekah J. Glover on behalf of Retail Energy Supply Association