

**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 §4928.143, Revised) Case No. 16-1852-EL-SSO
Code, in the Form of an Electric Security Plan.)

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

MOTION TO INTERVENE OF THE ELECTRIC VEHICLE CHARGING ASSOCIATION

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“OAC”) Rule 4901-1-11, and the Attorney Examiner Entry dated February 7, 2017, the Electric Vehicle Charging Association (“EVCA” or “the Association”) moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant EVCA leave to intervene because EVCA has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede EVCA’s ability to protect that interest.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, EVCA is a real party in interest in this proceeding. EVCA submits that its interest is not represented by existing parties and thus its interests are not now represented. EVCA’s participation will not unduly delay this proceeding or prejudice any existing party. By granting EVCA’s motion to intervene, the Commission will permit EVCA to contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings.

MEMORANDUM IN SUPPORT

EVCA is a not-for-profit coalition of electric vehicle charging organizations and companies. EVCA's mission is to educate policymakers, stakeholders, and members of the public about the critical role of electric vehicle ("EV") technology, infrastructure, and services, and to advocate for policies that will expand clean transportation. EVCA's membership includes leading EV charging suppliers and facilitators, providing charging solutions for customers for all segments of the market, including residential, multi-family dwelling, retail, workplace, and DC fast charging segments.

On November 23, 2016, Ohio Power Company ("AEP Ohio" or "the Company") filed an application to extend and modify its Electric Security Plan ("ESP"). Contained in that application is a Distribution Technology Investment Plan ("the Plan") detailing the deployment of various technologies, including charging stations to support EVs. The Plan would result in AEP Ohio owning and operating 1275 new EV charging stations in Ohio. The Company intends to recover the costs of the Plan through a Distribution Technology Rider.

Under OAC Rule 4901-1-11 intervention may be permitted in a proceeding if that party has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties. Further, in deciding whether to permit intervention under paragraph (A)(2) of this rule, the Commission, the legal director, the deputy legal director, or an attorney examiner shall consider:

- (1) The nature and extent of the prospective intervenor's interest.
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case.

- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings.
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.
- (5) The extent to which the person's interest is represented by existing parties.

EVCA meets these criteria for intervention. First, EVCA and its members have a significant interest in AEP Ohio's pending application. EVCA members and their customers represent a vast majority of the established and growing electric vehicle infrastructure sector in Ohio.

EVCA's position and market presence relates directly to the details of the Plan. EVCA's membership has a substantial and specific economic interest in the sustainable and scalable growth of the EV charging infrastructure in Ohio. EVCA's membership is directly affected by the discussion and resolution of the topics covered in this proceeding. Consistent with the requirements of R.C. 4903.221 and O.A.C. Rule 4901-1-11, the interests of the Association in this proceeding cannot be adequately represented or protected by any other party.

The Association's intervention will not unduly prolong or delay the proceedings. EVCA has filed for intervention according to the procedural schedule set forth by the Commission and fully intends to contribute to all specified procedural activities as a responsible party.

Finally, EVCA's intervention will significantly contribute to the full development of the record and its resolution. The Association's membership has deployed charging infrastructure throughout the United States, bringing to bear significant experience in developing scalable and sustainable EV charging markets. EVCA's intervention provides a unique, practical perspective on how AEP Ohio's Plan may affect EV drivers, EV charging station site hosts, Ohio ratepayers, and the overall potential for growth in Ohio's EV market.

For these reasons, the EVCA respectfully requests that its Motion to Intervene be granted.

Respectfully submitted on behalf of
ELECTRIC VEHICLE CHARGING ASSOCIATION



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 1st day of March 2017 *via* electronic mail.



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Summary: Motion to Intervene of The Electric Vehicle Charging Association electronically filed by Teresa Orahod on behalf of Dylan F. Borchers