

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The Dayton Power and Light Company)	
for Approval of its Energy Efficiency and)	Case No. 17-1398-EL-POR
Peak Demand Reduction Portfolio Plan)	Case No. 17-1399-EL-WVR
for 2018 through 2020.)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned applications pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute, or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application is for approval of The Dayton Power and Light Company’s (“DP&L”) Energy Efficiency and Peak Demand Reduction Portfolio Plan for 2018 through 2020.

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 applications.

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, which will address DP&L’s Energy Efficiency and Peak Demand Reduction Portfolio Plan for 2018 through 2020 and its requested waiver of Ohio Administrative Code Rule 4901:1-39-05(C) setting forth the time to file an annual portfolio status

report addressing the performance of all of its approved energy efficiency and peak demand reduction programs.

OPAЕ includes as members non-profit organizations located in the service area that will be affected by this application.¹ Moreover, many of OPAЕ'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 is charged with advocating for low-income residents of their communities. OPAЕ members also provide essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of DP&L.

OPAЕ's primary focus in these cases is to protect the interests of low and moderate-income Ohioans whose provision of electric service will be affected by these applications. Further, OPAЕ has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, who will be affected by the outcome of these cases.

For the above reasons, OPAЕ has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede OPAЕ's ability to protect its interests. No other party to the matters will adequately represent the interests of OPAЕ. OPAЕ is a rare organization that serves as an advocate, service provider and non-profit customer group. No other party represents this group of interests. OPAЕ'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.

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

Therefore, OPAE is entitled to intervene in these applications 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,

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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 the parties listed below who are electronically subscribed on this 16th day of June 2017.

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