

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

Via E-File

June 18, 2018

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 18-1007-EL-UNC

Dear Counsel:

Please find attached the MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP for filing in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.
Cc: Certificate of Service

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Ohio Power Company's
Implementation of the Tax Cuts and Jobs Act of
2017

: Case No. 18-1007-EL-UNC
:
:

**MOTION TO INTERVENE OF THE
THE OHIO ENERGY GROUP**

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

June 18, 2018

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Ohio Power Company's	:	Case No. 18-1007-EL-UNC
Implementation of the Tax Cuts and Jobs Act of	:	
2017	:	

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utilities Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Amsted Rail Company, Inc., ArcelorMittal USA LLC, Arconic, Ford Motor Company, GE Aviation, Greif, Inc., Linde, Inc., POET Biorefining, Praxair Inc., TimkenSteel Corporation and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

June 18, 2018

COUNSEL FOR THE OHIO ENERGY GROUP

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the attached service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 18th day of June, 2018 to the persons listed below.



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

*Dressel, Brian W Mr.

Carpenter Lipps & Leland LLP

280 North High St. Suite 1300

Columbus OH 43215

*Whitfield, Angela Mrs.

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus OH 43215

*Coffey, Sandra

Public Utilities Commission of Ohio

180 E. Broad St.

Columbus OH 43215

*Darr, Frank P Mr.

McNees, Wallace & Nurick

21 E. State Street 17th Floor

Columbus OH 43215

*Whitfield, Angela Mrs.

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus OH 43215

*Nourse, Steven T Mr.

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus OH 43215

The Kroger Co. #867

Kyle Seeling

1014 Vine St 19th Fl

Cincinnati Oh 45202

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/18/2018 4:01:26 PM

in

Case No(s). 18-1007-EL-UNC

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group