

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term)	
Forecast Report on behalf of Ohio Power)	Case No. 18-501-EL-FOR
Company and Related Matters.)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF
DIRECT ENERGY, LP**

In accordance with R.C. 4903.221 and Ohio Admin. Code 4901-1-11, Direct Energy, LP
(Direct) request issuance of an entry granting intervention in this proceeding. The reasons
supporting this intervention are stated below in the Memorandum in Support.

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).

Direct meets all of the criteria for intervention. Direct holds Certificate Nos. 00-019E(9), 00-05E(9), and 13-707E(3)¹ as a competitive retail electric service provider from the Commission to engage in the competitive sale of electric service to retail customers in Ohio. Direct currently provides service to retail electric customers in the AEP Ohio service territory, including many commercial and industrial customers that will be impacted by the renewable projects contemplated in the Application in this proceeding. Direct has a real and substantial interest in this proceeding, including, but not limited to, any projects developed and approved through this proceeding maintain the integrity of the competitive retail marketplace.

The issues impacting Direct, as identified above, demonstrate the depth of Direct’s real and substantial interest in this case. Direct will advance legal positions that are directly relevant to the merits of the case and Direct’s position. Additionally, Direct’s direct and unique pecuniary interest in this proceeding cannot be represented by other intervenors. Direct’s unique expertise and participation in the competitive retail and wholesale markets in Ohio and across the country will significantly contribute to the development of a full and complete record to assist the

¹ Direct Energy, LP is a Texas limited partnership registered with the State of Ohio and whose subsidiaries and affiliates, including Direct Energy Business, LLC, Direct Energy Business Marketing, LLC, and Direct Energy Services, LLC, develop, operate, or sell solar resources throughout the state, including in the AEP Ohio territory.

Commission in its consideration of the Application. Finally, Direct's intervention will not unduly delay the instant proceedings.

Accordingly, Direct respectfully requests that the Commission grant this Motion to Intervene.

Dated: October 9, 2018

Respectfully submitted,

/s/ Mark A. Whitt

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ATTORNEYS FOR DIRECT ENERGY, LP

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 9th day of October, 2018 to the following:

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/s/ Rebekah J. Glover

One of the Attorneys for Direct Energy, LP

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Case No(s). 18-0501-EL-FOR

Summary: Motion to Intervene and Memorandum in Support electronically filed by Ms. Rebekah J. Glover on behalf of Direct Energy, LP