

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Long-Term Forecast	)	
Report of Ohio Power Company and	)	Case No. 18-0501-EL-FOR
Related Matters.	)	

In the Matter of the Application Seeking	)	
Approval of Ohio Power Company's	)	
Proposal to Enter into Renewable Energy	)	Case No. 18-1392-EL-RDR
Purchase Agreements for Inclusion in the	)	
Renewable Generation Rider.	)	

In the Matter of the Application of Ohio	)	
Power Company to Amend its Tariffs.	)	Case No. 18-1393-EL-ATA

**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.

Respectfully submitted,

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ATTORNEYS FOR RETAIL ENERGY  
SUPPLY ASSOCIATION

## **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 AEP Ohio.<sup>1</sup> RESA is and has historically been active in many electric industry proceedings at the Commission since its inception.

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. The proposed arrangement in these proceedings has the potential to impact those interests by introducing subsidized resources as a direct competitor to RESA members. The interests of the RESA membership cannot be adequately represented by other parties. The Commission’s decision in this matter will affect the continued viability of the competitive retail electric market in AEP

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

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, and will not unduly prolong or delay the proceeding.

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

Dated: October 26, 2018

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 26th day of October, 2018 to the following:

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One of the Attorneys for Retail Energy Supply  
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Summary: Motion to Intervene and Memorandum in Support electronically filed by Shelli T Clark on behalf of Retail Energy Supply Association