

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Long-Term Forecast)	
Report of Ohio Power Company and Related)	
Matters)	Case No. 18-501-EL-FOR
In The Matter of the Application Seeking)	
Approval of Ohio Power Company's Proposal)	
to Enter Into Renewable Energy Purchase)	
Agreements For Inclusion in the Renewable)	Case No. 18-1392-EL-RDR
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
ONE ENERGY ENTERPRISES LLC**

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (OAC) Rule 4901-1-11 One Energy Enterprises LLC (“One Energy”) moves to intervene in the above-captioned proceedings. One Energy requests that the Public Utilities Commission of Ohio (“Commission”) grant One Energy’s motion because One Energy has a real and substantial interest in these proceedings, the Commission’s disposition of these proceedings may impair or impede One Energy’s ability to protect that interest, and One Energy’s participation will not cause undue delay.

MEMORANDUM IN SUPPORT

One Energy, based in Findlay, Ohio, has installed 24 megawatts (“MWs”) of operating behind-the-meter wind projects for industrial and manufacturing energy customers in Ohio with an additional 10.5 MWs under construction. One Energy is responsible for developing more net metered wind projects in Ohio than all other entities combined. One Energy’s projects range from 1.5 MWs to 4.5 MWs in size and its customers include Cooper Farms, Haviland Plastics, Whirlpool Corporation, Ball Corporation, and Marathon Petroleum, among others.

One Energy will be affected by the Commission’s determination in these matters and should be permitted to intervene because it has a real and substantial interest in these proceedings. Pursuant to Attorney Examiner Entry dated October 22, 2018, motions to intervene in this case are due by October 29, 2018. Therefore, this motion to intervene is timely.

One Energy continues to be involved in efforts at the Commission and through its work with Ohio’s electric distribution utilities to promote fair and nondiscriminatory practices and policies for behind-the-meter projects in Ohio while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of the matters in these proceedings does not have a negative impact on industrial and manufacturing customers with behind-the-meter generation or those installing behind-the-meter generation in Ohio. One Energy’s substantial interest in these proceedings is not adequately addressed by any other party. One Energy’s participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to those who have installed or are installing behind-the-meter generation in Ohio.

Accordingly, One Energy respectfully requests the Commission determine that One Energy has a real and substantial interest in these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

Respectfully submitted on behalf of
ONE ENERGY ENTERPRISES LLC,

/s/ Katie Johnson Treadway

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CERTIFICATE OF SERVICE

The Commission's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case.

/s/ Katie Johnson Treadway

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10/26/2018 3:46:30 PM

in

Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Motion to Intervene of One Energy Enterprises LLC electronically filed by Teresa Orahod on behalf of Katie Johnson Treadway