

In the Matter of the PowerForward)
Distribution System Planning Workgroup.) Case No. 18-1596-EL-GRD

Ohio Partners for Affordable Energy (“OPAE”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned matter pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code Rule 4901-1-11 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.

/s/ Colleen Mooney
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward)
Distribution System Planning Workgroup.) Case No. 18-1596-EL-GRD

MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this matter pursuant to Section 4903.22.1, Ohio Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced matter concerns the Commission’s creation of a Distribution System Planning Workgroup to continue discussions on the advancement of a comprehensive grid modernization endeavor entitled PowerForward.

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 this matter.

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 this matter. Additionally, OPAE includes as members non-profit organizations located in the electric distribution service areas that will be affected by the matter.¹ Moreover, many of OPAE'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

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

1964, community action agencies are charged with advocating for low-income residents of their communities.

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of Ohio's electric distribution utilities. OPAE members are also non-residential ratepayers of Ohio's electric distribution utilities.

OPAE's primary interest in this case is to protect the interests of low- and moderate-income residential customers and OPAE members whose provision of electric distribution service will be affected by this matter. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this matter.

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

Therefore, OPAE is entitled to intervene in this matter 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,

s/s Colleen Mooney

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CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served by the Commission's Docketing Division electronically upon persons who are electronically subscribed to this case on this 19th day of November 2018.

/s/Colleen Mooney
Colleen L. Mooney

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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