

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward)	
Collaborative)	Case No. 18-1595-EL-GRD
)	

**MOTION OF OHIO POWER COMPANY
TO INTERVENE**

Pursuant to Rules 4901-1-11 and 4901:1-38-05(F), Ohio Administrative Code (O.A.C.), Ohio Power Company (AEP Ohio) hereby moves the Public Utilities Commission of Ohio (Commission) to intervene in this proceeding. A memorandum in support is attached.

Respectfully submitted,

/s/ Steven T. Nourse

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MEMORANDUM IN SUPPORT

AEP Ohio was served with the entries in this proceeding and the Commission issued certain directives to AEP Ohio and the other electric distribution utilities (EDUs). Under these circumstances, AEP interprets this approach as already treating AEP Ohio as a party to the proceeding. In an abundance of caution, however, AEP Ohio respectfully requests that it be permitted to intervene in this proceeding. Section 4901-1-11 (A) (2), Ohio Admin. Code, provides:

- (A) Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:
- (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, §4901-1-11 (B), Ohio Admin. Code provides:

- (B) In deciding whether to permit intervention under paragraph (A) (2) of this rule, the commission, the legal director, the deputy legal director, or an attorney examiner shall consider:
 - (1) The nature and extent of the prospective intervenor's interest.
 - (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case.
 - (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings.
 - (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.
 - (5) The extent to which the person's interest is represented by existing parties.¹

¹ Factors (B) (1) – (4) are consistent with §4903.221 (B), Ohio Rev. Code.

Regarding these criteria, AEP Ohio has a clear and direct interest in this proceeding. AEP Ohio's intervention will not prolong or delay this proceeding. Further, AEP Ohio has a vital interest in the outcome of this proceeding as directives and findings will continue to be issued that involve EDUs. Moreover, as one of only four EDUs in Ohio, AEP Ohio will be in a unique position to contribute to the full development and equitable resolution of issues in the proceeding.

Respectfully submitted,

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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 upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Ohio Power Company's Motion to Intervene* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 4th day of December 2018, via electronic transmission.

/s/ Steven T. Nourse

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Summary: Motion - Motion of Ohio Power Company to Intervene electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company