

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

In the Matter of the PowerForward Data and Modern Grid Workgroup.)	Case No. 18-1597-EL-GRD
)	

**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) requests issuance of an entry granting intervention in these proceedings. 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 certification 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 throughout the state, and as such has a real and substantial interest in these proceedings. In addition, Direct will advance legal positions that are directly relevant to the merits and Direct’s position. Direct’s direct and unique pecuniary interest 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 Commission in its consideration of these proceedings. Finally, Direct’s intervention will not unduly delay the instant proceedings.

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

Dated: December 10, 2018

Respectfully submitted,

/s/ Rebekah J. Glover

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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 10th day of December, 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). 18-1595-EL-GRD, 18-1596-EL-GRD, 18-1597-EL-GRD

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