

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of 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 OF EVELOCITY, LTD**

In accordance with R.C. 4903.221 and Ohio Admin. Code 4901-1-11, Evelocity, Ltd.

(Evelocity) requests issuance of an entry granting it leave to intervention in these proceedings.

The reasons supporting this intervention are stated below in the Memorandum in Support.

Dated: January 3, 2019

Respectfully submitted,

/s/Christopher J. Klym

Christopher J. Klym (0062508)

General Counsel

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**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 and extent of the intervenor’s interest; the legal position advanced by the prospective intervenor and its probable relation to the merits of the case; whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; and whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues. *See* R.C. 4903.221(B)(1-4). The Commission must also consider the extent to which intervenors interest in represented by existing parties. *See* OAC 4909-1-11(B)(5).

Evelocity meets all of the criteria for intervention. Evelocity is an Ohio limited liability company engaged in providing data-driven analysis and other consulting services necessary to assist public and private entities plan for, and transition to, electric vehicles. Such services include data, site and grid analysis to determine the optimal locations for the placement of electric vehicle charging stations in a transportation corridor, region or throughout a business’

locations. Evelocity also assists public and private fleets to transition from the use of combustion engine vehicles to electric vehicles, examining suitability, vehicle type and use, access to grid infrastructure at fleet facilities, demand charges, engineering, and overall cost analysis. As such, Evelocity has a direct stake into the development and deployment of electric vehicle charging stations throughout the State of Ohio and across the United States and, as a result, in the grid modernization and distribution issues that arise therefrom. Evelocity has a real and substantial interest in these proceedings. In addition, Evelocity will advance legal positions that are directly relevant to the merits and its position. The direct and unique pecuniary interests of Evelocity's cannot be represented by other intervenors. Evelocity's unique expertise and participation in the electric vehicle industry, including charging station deployment 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, Evelocity's intervention will not unduly delay the instant proceedings.

Accordingly, Evelocity has a real and substantial interest and respectfully requests that the Commission grant its Motion to Intervene R.C. 4903.221 and Ohio Admin. Code 4901-1-11.

Dated: January 3, 2019

Respectfully submitted,

/s/Christopher J. Klym  
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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 electric mail this 3 day of January, 2019 to the following:

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/s/ Christopher J. Klym  
Attorney for Evelocity, LTD

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Summary: Motion to Intervene of Evelocity, Ltd. electronically filed by Mr. Christopher J Klym on behalf of Evelocity, Ltd.