

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for an Increase)	Case No. 20-0585-EL-AIR
In Electric Distribution Rates.)	

In the Matter of the Application of)	
Ohio Power Company for Tariff Approval.)	Case No. 20-0586-EL-ATA

In the Matter of the Application of)	
Ohio Power Company for Approval to)	Case No. 20-587-EL-AAM
Change Accounting Methods.)	

**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT**

Matthew R. Pritchard (Reg. No. 0088070)
(Counsel of Record)
Rebekah J. Glover (Reg. No. 0088798)
MCNEES WALLACE & NURICK LLC
21 East State Street, 17TH Floor
Columbus, OH 43215
Telephone: (614) 719-2842
Telecopier: (614) 469-4653
mpritichard@mcneeslaw.com
rglover@mcneeslaw.com
(willing to accept service via email)

JUNE 1, 2020

COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR LEAVE TO INTERVENE**

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On June 1, 2020, the Ohio Power Company ("AEP Ohio") filed an Application for an Increase in Electric Distribution Rates, Application for Tariff Approval and an Application to Change Accounting Methods. IEU-Ohio's members include customers of AEP-Ohio and the resolution of the matter may directly affect rates paid by IEU-Ohio members.

As demonstrated further in the Memorandum in Support, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned

proceeding and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in this proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of Commission rules to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)

(Counsel of Record)

Rebekah J. Glover (Reg. No. 0088798)

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at <https://www.ieu-ohio.org/member-list/>. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU").

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the State policy contained in R.C. 4928.02.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)

(Counsel of Record)

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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 *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 1st day of June, 2020, via electronic transmission.

/s/ Matthew R. Pritchard

Matthew R. Pritchard

Email Service List:

stnourse@aep.com
cblend@aep.com
Angela.Obrien@occ.ohio.gov
Bojko@carpenterlipps.com
Paul@carpenterlipps.com
MKurtz@BKLawfirm.com
KBoehm@BKLawfirm.com
JKylercohn@BKLawfirm.com
Christopher.Healey@occ.ohio.gov
Bethany.Allen@igs.com
Joe.Olier@igs.com
Michael.Nugent@igs.com

Attorney General's Office:

Werner.Margard@ohioattorneygeneral.gov
Steven.Darnell@ohioattorneygeneral.gov

Attorney Examiners:

Greta.See@puc.state.oh.us
Sarah.Parrot@puc.state.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/1/2020 12:40:12 PM

in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio
electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio