

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of Ohio )	
Power Company For an increase in Electric )	
Distribution Rates )	Case No. 20-585-EL-AIR

In the Matter of the Application of Ohio )	
Power Company For Tariff Approval )	Case No. 20-586-EL-ATA

In the Matter of the Application of Ohio )	
Power Company For Approval to Change )	
Accounting )	Case No. 20.587-EL-AAM

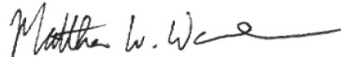
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**MOTION TO INTERVENE OF  
ONE ENERGY ENTERPRISES LLC**

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Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code (OAC) Rule 4901-1-11, One Energy Enterprises LLC ("One Energy") moves to intervene in the above-captioned proceedings. As set forth in more detail in the attached Memorandum in Support, One Energy requests that the Public Utilities Commission of Ohio ("Commission") grant One Energy's motion because One Energy has a real and substantial interest in these proceedings, the Commission's disposition of these proceedings may impair or impede One Energy's ability to protect that interest, and One Energy's participation will not cause undue delay.

Respectfully submitted on behalf of  
ONE ENERGY ENTERPRISES, LLC



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**MEMORANDUM IN SUPPORT**

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One Energy, based in Findlay, Ohio, has installed 40.5 megawatts (“MWs”) of operating behind-the-meter wind projects for industrial and manufacturing companies in Ohio. One Energy is responsible for developing more net metered wind projects in Ohio than all other entities combined. One Energy’s projects range from 1.5 MWs to 4.5 MWs and serve a range of manufacturing and industrial facilities. One Energy is, by far, the largest installer on net metered wind projects in AEP’s service territory.

Pursuant to Attorney Examiner Entry dated November 23, 2020, motions to intervene in this case are due by December 18, 2020. Therefore, this motion to intervene is timely.

One Energy will be affected by the Commission’s determination in these matters and should be permitted to intervene because it has a real and substantial interest in these proceedings. One Energy continues to be involved in efforts at the Commission and through its work with Ohio’s electric distribution utilities to promote fair and nondiscriminatory practices and policies for behind-the-meter projects in Ohio, while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of the matters in these proceedings does

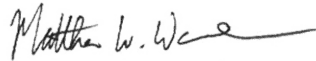
not have a negative impact on industrial and manufacturing customers with behind-the-meter generation, or those installing behind-the-meter generation in Ohio.

One Energy is also an AEP primary voltage customer at multiple locations, including its corporate office.

One Energy's substantial interest in these proceedings is not adequately addressed by any other party. One Energy's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to those who have installed or are installing behind-the-meter generation in Ohio.

Accordingly, One Energy respectfully requests the Commission determine that One Energy has a real and substantial interest in these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

Respectfully submitted on behalf of  
ONE ENERGY ENTERPRISES, LLC



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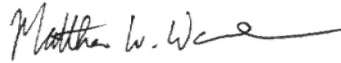
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## **CERTIFICATE OF SERVICE**

In accordance with O.A.C. 4901-1-05, 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* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 4<sup>th</sup> day of December 2020.



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

Summary: Motion to Intervene of One Energy Enterprises LLC electronically filed by Teresa Orahod on behalf of Matthew W. Warnock