Before

**The Public Utilities Commission of Ohio**

In the Matter of the Application of Ohio )

Power Company for Authority to Establish ) Case No. 16-1852-EL-SSO

a Standard Service Offer Pursuant to )

R.C. 4928.143, in the Form of an Electric )

Security Plan. )

In the Matter of the Application of Ohio )

Power Company for Approval of Certain ) Case No. 16-1853-EL-AAM

Accounting Authority. )

# Motion to Intervene and Memorandum In Support

# of Industrial Energy Users-Ohio

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September 8, 2016 Attorneys for Industrial Energy Users-Ohio

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# Motion to Intervene of Industrial Energy Users-Ohio

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

On December 20, 2013, Ohio Power Company (“AEP-Ohio”) filed an application to establish an electric security plan (“ESP”) in case Nos. 13-2385-EL-SSO, *et al.* (“ESP III Case”). The Commission modified and approved the application in an Opinion and Order issued on February 25, 2015. On March 31, 2016, the Commission approved a stipulation in Case Nos. 14-1693-EL-RDR, *et al*. (“PPA Case”), that, among other things, required AEP-Ohio to file to extend and modify the ESP approved in the ESP III Case*.*  IEU-Ohio was granted intervention and participated in both proceedings.

On May 13, 2016, and in accordance with the aforementioned stipulation, AEP-Ohio filed in the ESP III Case to extend and modify its ESP. On September 7, 2016, the Commission directed AEP-Ohio to refile its May 13, 2016 ESP application and testimony in the above-captioned matters.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, 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 the 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 the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

*/s/ Matthew R. Pritchard*

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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 http://www.ieu-ohio.org/member\_list.aspx. IEU-Ohio’s members purchase substantial amounts of electric and related services from Ohio’s electric distribution utilities (“EDU”) including AEP-Ohio.

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 Section 4928.02, Revised Code.

This proceeding addresses, among other things, terms and conditions of a stipulation that required AEP-Ohio to file to extend and modify the ESP approved in the ESP III Case. IEU-Ohio was granted intervention and participated in both the ESP III proceeding and the subsequent case in which the stipulation was filed and approved. 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 is the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Accordingly, IEU-Ohio requests that the Commission grant its motion to intervene.

Respectfully submitted,

*/s/ Matthew R. Pritchard*

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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 8th day of September 2016, *via* electronic transmission.

/s/ Matthew R. Pritchard

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