

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Dayton Power )  
& Light Company for Approval of an Electric ) Case No. 08-1094-EL-SSO  
Security Plan. )

In the Matter of the Application of Dayton Power )  
& Light Company for Approval Revised Tariffs. ) Case No. 08-1095-EL-ATA

In the Matter of the Application of Dayton Power )  
& Light Company for Approval of Certain ) Case No. 08-1096-EL-AAM  
Accounting Authority Pursuant to Section )  
4905.13, Revised Code. )

In the Matter of the Application of Dayton Power )  
& Light Company, for Approval of Amended )  
Corporate Separation Plan. ) Case No. 08-1097-EL-UNC  
)

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**MOTION TO INTERVENE  
OF  
OHIO MANUFACTURERS' ASSOCIATION**

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Pursuant to §4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, the Ohio Manufacturers' Association ("OMA") moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio ("Commission") should grant OMA leave to intervene because OMA has a real and substantial interest in these proceedings, and the Commission's disposition of these proceedings may impair or impede OMA's ability to protect that interest.

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## MEMORANDUM IN SUPPORT

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The Ohio Manufacture's Association ("OMA") should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests. OMA was actively involved in the recent legislative process that resulted in enactment of Senate Bill 221, and has been granted intervention in the standard service offering ("SSO") proceedings before the Public Utilities Commission of Ohio ("Commission"). OMA is the only statewide association exclusively serving manufacturers. It has more than 1,700 Ohio manufacturing companies as members. OMA's member companies consume medium to large amounts of electrical energy and must rely on their host electric distribution utilities, Dayton Power & Light Company ("DP&L"), to deliver the electric power necessary in their operations.

OMA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceedings could have a substantial effect on the electricity costs of OMA members, including those OMA members in the service area of DP&L.

Consistent with the requirements of R.C. Section 4903.221, and OAC Rule 4901-1-11(B), OMA is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding or prejudice any existing party. OMA submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding; and that its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party.

OMA has a substantial interest in these proceeding that is not adequately addressed by any other party. OMA'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 its membership.

WHEREFORE, the Ohio Manufacturers' Association respectfully requests that its motion to intervene be granted.


Respectfully submitted on behalf of  
THE OHIO MANUFACTURERS' ASSOCIATION

A handwritten signature in dark ink, appearing to read 'T. O'Brien', is written over a horizontal line.

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 10<sup>th</sup> day of December 2008 via electronic mail.

  
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