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BEFORE THE

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PUBLIC UTILITIES COMMISSION OF OHIO

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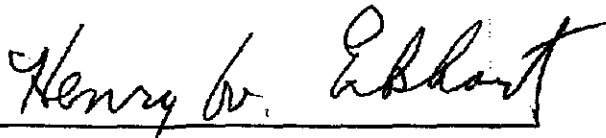
In the Matter of Aligning Electric)
Distribution Utility Rate Structure With)
Ohio's Public Policies to Promote)
Competition, Energy Efficiency, and)
Distributed Generation.)

Case no. 10-3126-EL-UNC

**MOTION TO INTERVENE
BY
THE NATURAL RESOURCES DEFENSE COUNCIL**

The Natural Resources Defense Council ("NRDC") moves the Public Utilities Commission of Ohio ("Commission") for leave to Intervene in the above styled case pursuant to Sec. 4903.221 Revised Code of Ohio, and Rule 4901-1-11 of the Ohio Administrative Code, with full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The NRDC provides the following Memorandum In support of the foregoing Motion.



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Attorney for The Natural Resources Defense Council

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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene The Natural Resources Defense Council ("NRDC") states that it is a non-profit environmental organization with over 30 years experience working on state energy policy, including utility regulation and energy efficiency. NRDC has a strong historical interest in ensuring that Ohio adopts environmentally sound and sustainable energy policies.

NRDC and its 12,600 members who live in Ohio are interested in promoting greater reliance on energy efficiency and renewable energy to meet Ohio's energy needs.

NRDC will bring significant expertise to bear in these proceedings. The Staff of NRDC have extensive history with the design and implementation of utilities programs and policies designed to deploy energy efficiency and renewable energy technologies to benefit the public.

NRDC has intervened and/or provided testimony on these issues in similar proceedings in a number of states including Illinois, Wisconsin, New York, Oregon, California, New Jersey, and Iowa, to name a few. NRDC has also been granted intervention in numerous cases before the Public Utilities Commission of Ohio.

NRDC has regularly presented testimony before the U. S. Congress and various state legislatures related to the utility industry use of energy efficiency and renewable energy resources, utility rate design, utility planning and other topics relevant to this proceeding.

Many of the Ohio NRDC members are served by the utility companies that are the subject of, and parties in this case.

The NRDC has a real and substantial interest in these proceedings as they may directly or indirectly impact the environment, the economy of the State of Ohio, and other areas of the United States, and the utility bills of its members.

Intervention of NRDC will not unduly prolong or delay the proceeding.

Intervention of NRDC will significantly contribute to the full development of the record.

NRDC's particular interest in this proceeding is that Ohio's electric utilities' distribution rate design and adjustment mechanisms support Ohio's public policy objectives of increased energy efficiency and distributed generation.

WHEREFORE, The Natural Resources Defense Council respectfully requests that its Motion to Intervene be granted in full as aforesaid.

Respectfully submitted,



Henry W. Eckhart (0020202)

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Council

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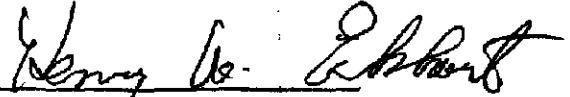
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing Motion To Intervene on the following parties by ordinary first class mail, postage prepaid, or by electronic transfer, this 9th day of February, 2011.



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