

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of The Dayton Power And Light Company For Approval Of Its Market Rate Offer.	) ) ) ) )	Case No. 12-426-EL-SSO
In The Matter Of The Application Of The Dayton Power And Light Company For Approval Of Revised Tariffs.	) ) ) ) )	Case No. 12-427-EL-ATA
In The Matter Of The Application Of The Dayton Power And Light Company For Approval Of Certain Accounting Authority.	) ) ) ) )	Case No. 12-428-EL-AAM
In The Matter Of The Application Of The Dayton Power And Light Company For The Waiver of Certain Commission Rules.	) ) ) ) )	Case No. 12-429-EL-WVR
In The Matter Of The Application Of The Dayton Power And Light Company To Establish Tariff Riders.	) ) ) ) )	Case No. 12-672-EL-RDR

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**MOTION TO INTERVENE OF THE OMA ENERGY GROUP**

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Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code (“O.A.C.”), the OMA Energy Group (“OMAEG”) hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio (“Commission”) should grant the motion to intervene because the OMAEG has a real and substantial interest in this proceeding, and the Commission’s disposition of this proceeding may impair or impede the OMAEG’s ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay this proceeding and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMAEG’s interests

will not be adequately represented by other parties to this proceeding. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted on behalf of  
THE OMA ENERGY GROUP



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**MEMORANDUM IN SUPPORT**

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On March 30, 2012, The Dayton Power and Light Company (“DP&L”) filed an application seeking approval of its standard service offer (“SSO”), as required pursuant to Section 4928.141, Revised Code. For the purpose of complying with its SSO requirement, DP&L filed a market rate offer (“MRO”) under Section 4928.142, Revised Code, which it proposes to begin on January 1, 2013 and continue through May 31, 2018.

The members of OMAEG will be impacted by the Commission’s decision relating to DP&L’s MRO, and the OMAEG should be permitted to intervene in the above-captioned proceeding.

The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from DP&L, and will be affected by the Commission's determination in this matter. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of Section 4903.221, Revised Code, and Rule 4901-1-11(B), O.A.C., the OMAEG submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership.

Accordingly, the OMAEG respectfully requests the Commission grant its Motion to Intervene pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, O.A.C.

Respectfully submitted on behalf of  
THE OMA ENERGY GROUP



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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 2<sup>nd</sup> day of April 2012 via email transmission or first class mail.



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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/2/2012 3:02:42 PM**

**in**

**Case No(s). 12-0426-EL-SSO**

Summary: Motion Motion to Intervene of the OMA Energy Group electronically filed by Teresa Orahod on behalf of OMA Energy Group