

**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

MOTION TO INTERVENE BY HONDA OF AMERICA MFG., INC.

Now comes Honda of America Mfg., Inc. (“Honda”), and respectfully moves the Commission for leave to intervene in the above-captioned proceeding pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. Honda has a real, direct and substantial interest in this proceeding. Honda’s interest in this proceeding is not adequately represented by any existing party and granting this motion to intervene will not unduly delay this proceeding or unjustly prejudice any party. The attached memorandum sets forth more fully reasons the Commission should grant Honda’s Motion.

Respectfully submitted,

/s/ M. Anthony Long
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MEMORANDUM IN SUPPORT

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 Ohio Revised Code Section 4928.141. For the purpose of complying with its SSO requirement, DP&L filed a market rate offer (“MRO”) under Ohio Revised Code Section 4928.142, which it proposes to begin on January 1, 2013 and continue through May 31, 2018.

R.C. 4903.221 provides, in part, that any person “who may be adversely affected” by a PUCO proceeding is entitled to seek intervention in that proceeding. Honda is a large industrial customer of DP&L and “may be adversely affected” by this proceeding. Thus, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C. 4903.221(b) requires the Commission to consider the following criteria in ruling on motions to intervene:

- (1) The nature and extent of the prospective intervenor’s interest;

- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; and
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

Honda is an active large industrial customer and participated as an intervening party in DP&L's prior SSO filing (Case No. 08-1094-EL-SSO) and was an active participant in the negotiations that concluded Case No. 08-1094-EL-SSO. Moreover, as a large industrial user of electricity, Honda has a direct and substantial interest in the terms and conditions of DP&L's tariffs and tariff riders.

Honda submits that its participation in this proceeding with the experience and expertise that it brings, will contribute to a just and expeditious resolution of the issues raised by the Application. Honda further submits that its intervention will not unduly delay the proceeding or unjustly prejudice an existing party. Without the ability to participate, however, Honda's interest in this proceeding will not be adequately protected by the existing parties.

In addition, Honda meets the criteria of Ohio Admin. Code 4901-1-11(A). Honda has a real and substantial interest in this proceeding and should be granted leave to intervene in order to protect its interests as an active and significant customer of DP&L.

For the reasons stated above, Honda respectfully requests that its Motion for Leave to Intervene be granted.

Respectfully submitted,

/s/ M. Anthony Long

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Senior Assistant Counsel (0037784)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 5th day of April 2012, via electronic transmission (email) or first class mail.

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Summary: Motion Motion to Intervene by Honda of America Mfg., Inc. electronically filed by Mr. M. Anthony Long on behalf of Honda of America Mfg., Inc.