

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term Forecast)	
Report of Ohio Power Company and)	Case No. 10-501-EL-FOR
Related Matters)	

In the Matter of the Long-Term Forecast)	
Report of Columbus Souther Power and)	Case No. 10-502-EL-FOR
Related Matters)	

MOTION OF UNIVERSITY OF TOLEDO
INNOVATION ENTERPRISES CORPORATION TO INTERVENE

University of Toledo Innovation Enterprises (“UTIE”) moves the Commission for leave to intervene in the subject cases for the reasons set forth in the memorandum below.

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MEMORANDUM IN SUPPORT

R.C. 4903.221 provides that a “person who may be adversely affected” by a proceeding may intervene in a proceeding before the Commission. A leader in the innovation and economic development of solar energy, UTIE will likely be adversely affected if not given the opportunity to voice its concerns and advocate its interests. UTIE is helping the University of Toledo become a transformative force in the world concerning its growing demand for energy. UTIE supports commercial activity that is

aligned with the University's mission of advancing knowledge through excellence in learning and its focus on innovation through exceptional strength in science and technology.

A critical component of UTIE's mission is to drive the transition of northwest Ohio from the "glass capital of the world" to the "solar capital of the world". UTIE maintains over 100,000 square feet of laboratory space and a variety of campuses for industry use and collaboration, including the Wright Center for Photovoltaics and Commercialization, the Nitschke Commercialization Complex and the Clean Energy and Alternative Energy Incubator. The University is the birthplace of the northwest Ohio solar hub and home to the 1.1 MW solar array project at the Scott Park Campus of Energy and Innovation. These assets allow UTIE to provide the resources necessary to support a vibrant and growing solar industry cluster that has been nationally recognized as one of the top two solar clusters in the nation and the core of the nation's strongest solar manufacturing supply chain.

UTIE seeks to intervene in this case because of its interest in ensuring that the 49.9 MW Turning Point Solar ("TPS") project is approved and constructed. The TPS project will source at least 85% of its components from Ohio companies; as one of the largest solar projects in the nation, UTIE will supply orders, jobs and capital investment critical to the continued development of Ohio's solar industry. The number of panels required for the project will lead to the world's largest photovoltaic manufacturer, Isofoton, building its North American headquarters in Napoleon, Ohio. The TPS project and the construction of Isofoton's new facility in Napoleon will yield more than 650

high paying jobs for northwest and southeast Ohio and will catalyze the creation of many more indirect jobs and capital investment.

In case no. 11-346-EL-SSO, the Commission allowed parties to intervene well into the life of the case. This approach to granting leave is equally appropriate here in this forecast case. In its entry of September 5, 2012, the Commission presented at least eight issues it wants the parties to address in briefs to be filed by October 3, 2012. Every issue directly concerns the TPS project. Because of UTIE's substantive expertise in this project, the Commission will benefit from the information UTIE will provide, and UTIE will not be asking to change the existing briefing schedule.

UTIE seeks the opportunity to explain how S.B. 221 (127th General Assembly) authorizes the Commission to order a finding of "need" for new generation construction and that, in fact, there is need for the TPS project. Significantly, AEP has established that its generation resource review supports the need for this solar construction. Once this Commission makes its finding of need, it will have grounds to find that it is appropriate and reasonable for AEP to use the TPS project to satisfy its in-state portfolio requirements. UTIE also would like the opportunity to provide support for AEP's methodology and application to integrate this solar resource into its generation portfolio.

The outcome in this proceeding has broad implication: growth of the northwest Ohio solar clusters and Ohio's solar supply chain; promotion by the University of state, national and global innovation; and the prosperity of Ohio citizens who work in this growing industry. Consistent with R.C. 4903.221(B)(3) and (B)(4), UTIE's appearance in this case will

not delay the proceeding and “will significantly contribute to full development and equitable resolution of the factual issues.”

For all these reasons, UTIE requests leave to intervene.

/s/ Jack D'Aurora

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CERTIFICATE OF SERVICE

I certify that a copy of this document is being served via the Commission's electronic service system on this 14th day of September 2012.

/s/ Jack D'Aurora

Jack D'Aurora

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in

Case No(s). 10-0501-EL-FOR, 10-0502-EL-FOR

Summary: Motion of University of Toledo Innovation Enterprises Corporation to Intervene electronically filed by Jack D'Aurora on behalf of University of Toledo Innovation Enterprises Corporation