

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Dayton	:	
Power and Light Company for Approval of	:	Case No. 13-833-EL-POR
Its Energy Efficiency and Peak Demand	:	Case No. 13-837-EL-WVR
Reduction Program Portfolio Plan for 2013	:	
Through 2015.	:	

PEOPLE WORKING COOPERATIVELY, INC.’ S MOTION TO INTERVENE

Pursuant to O.R.C. § 4903.221 and O.A.C. § 4901-1-11, People Working Cooperatively, Inc. (“PWC”) moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned proceeding. PWC’s interests in this proceeding and the reasons supporting this Motion are set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Richard R. Parsons

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MEMORANDUM IN SUPPORT

People Working Cooperatively, Inc. (“PWC”) respectfully requests leave to intervene in these proceedings because PWC has a real and substantial interest in the proceedings, the disposition of which may impair or impede PWC’s ability to protect that interest. For purposes of considering requests for leave to intervene in a Commission proceeding, the Ohio Administrative Code provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: . . . (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Ohio Admin. Code § 4901-1-11(A).

Further, Ohio Rev. Code § 4903.221(B) and Ohio Admin. Code § 4901-1-11(B) provide that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

(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; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

On April 15, 2013, Dayton Power and Light Company (“DP&L”) filed its application to seeking approval of its 2013-2015 energy efficiency and peak demand reduction program portfolio plan. PWC is a unique, non-profit organization that provides critical home repairs, weatherization, and energy management services to low-income, elderly, and disabled homeowners. PWC’s mission is provide these services so that its customers can remain in their homes and enjoy reduced energy costs. Given its mission, PWC seeks to serve low income,

elderly and disabled consumers in DP&L's service territory by providing weatherization and energy management services to them. Thus, PWC will be substantially impacted by the outcome of this proceeding. Accordingly, PWC has direct, real, and substantial interests in this proceeding.

PWC's intervention will not unduly delay this proceeding. Further, PWC is regularly and actively involved in Commission proceedings. PWC is so situated that without PWC's ability to fully participate in this proceeding, PWC's substantial interest will be prejudiced. Inasmuch as others participating in this proceeding cannot adequately protect PWC's interests, it would be inappropriate to determine this proceeding without PWC's participation.

III. CONCLUSION

For the reasons set forth above, PWC respectfully requests the Commission grant its Motion to Intervene.

Respectfully submitted,

/s/ Richard R. Parsons

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 18th day of June, 2013 via electronic mail or U.S. regular mail, postage prepaid upon the following:

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Summary: Motion to Intervene and Memorandum in Support of People Working Cooperatively, Inc. electronically filed by Mr. Richard R Parsons on behalf of People Working Cooperatively, Inc.