

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Ohio Power Company to Initiate )  
Phase 2 of its gridSMART Project ) Case No. 13-1939-EL-RDR  
and to Establish the gridSMART )  
Phase 2 Rider. )

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**INDUSTRIAL ENERGY USERS-OHIO'S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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**October 10, 2013**

**Attorneys for Industrial Energy Users-Ohio**

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**MOTION TO INTERVENE**

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Industrial Energy Users-Ohio (“IEU-Ohio”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code (“O.A.C.”), for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On September 13, 2013, Ohio Power Company (“AEP-Ohio”) filed an application in this proceeding to initiate Phase 2 of its gridSMART program and to establish a cost recovery mechanism for the Phase 2 costs. AEP-Ohio notes that the estimated cost of Phase 2 of the gridSMART program is \$268 million over the next 5 years and \$465 million over 15 years.<sup>1</sup> AEP-Ohio’s application proposes to recover these costs from all of its distribution customers in the same manner as it recovers its Phase 1 costs.<sup>2</sup>

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the

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<sup>1</sup> AEP-Ohio Application, Attachment A at 10 (Sep. 13, 2013).

<sup>2</sup> *Id.* at 3.

disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

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**MEMORANDUM IN SUPPORT**

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**I. MEMORANDUM IN SUPPORT**

In support of its Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at [http://www.ieu-ohio.org/member\\_list.aspx](http://www.ieu-ohio.org/member_list.aspx). IEU-Ohio's members obtain substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU") and AEP-Ohio in particular.

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

**II. CONCLUSION**

For the reasons stated herein, IEU-Ohio requests that the Commission grant IEU-Ohio's Motion to Intervene.

Respectfully submitted,

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**Attorneys for Industrial Energy Users-Ohio**

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Industrial Energy Users-Ohio's Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 10<sup>th</sup> day of October 2013, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

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### **ATTORNEY EXAMINERS**

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