

**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  
and to Establish the gridSMART  
Phase 2 Rider**

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**Case No. 13-1939-EL-RDR**

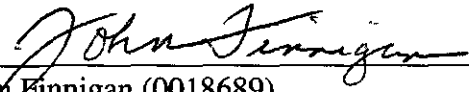
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**ENVIRONMENTAL DEFENSE FUND'S  
MOTION TO INTERVENE**

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Pursuant to Ohio Rev. Code § 4903.22.1 and Ohio Admin. Code § 4901-1-11, the Environmental Defense Fund ("EDF") moves for leave to intervene in this proceeding. As shown in the attached Memorandum in Support, EDF has a real and substantial interest in the proceeding and the Commission's disposition of this proceeding may impair or impede EDF's ability to protect that interest.

Respectfully submitted,



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## **MEMORANDUM IN SUPPORT**

EDF seeks leave to intervene in this proceeding pursuant to Ohio Rev. Code § 4903.22.1 and Ohio Admin. Code § 4901-1-11.

EDF is a national non-profit membership organization engaged in linking science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. EDF has over 300,000 members nationwide and has 9,590 members in Ohio. EDF has been active in Ohio working on environmental policies including smart power, climate change, natural gas fracking and sustainable agriculture.


EDF, through its current programs aimed at advancing "smart" electric and gas system modernization, is pursuing initiatives at the state and national levels designed to ensure that grid investments maximize their potential to create a cleaner, more resilient electric and gas system. Specifically, EDF works extensively with public utility commissions, industry, academia and other stakeholders across the country and in this region to evaluate, improve and advance electric and gas system investment plans so that they realize a full range of resiliency, environmental, economic and consumer benefits. EDF aims to ensure that grid modernization investments provide: (1) benefits that outweigh the costs of the investments; and (2) accountability that dollars spent are providing tangible benefits.

No other party to this proceeding can adequately represent EDF's interest. Intervention would neither unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, EDF has a real and substantial interest in this proceeding and is entitled to

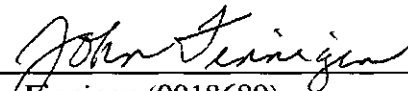
intervene under Ohio Rev. Code § 4903.22.1 and Ohio Admin. Code § 4901-1-11.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading was served by electronic mail (where available) or ordinary mail on the parties listed below, this 18<sup>th</sup> day of October, 2013.

  
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