

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The Dayton Power and Light Company to)	Case No. 15-361-EL-RDR
Update its Transmission Cost Recovery)	
Rider–Non-Bypassable)	

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

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April 27, 2015

Attorneys for Industrial Energy Users-Ohio

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**MOTION TO INTERVENE OF
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Industrial Energy Users-Ohio (“IEU-Ohio”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”), pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code, 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 March 16, 2015, The Dayton Power and Light Company (“DP&L”) filed an application to update its Transmission Cost Recovery Rider-Non-Bypassable (“TCRR-N”). In addition to updating its proposed charges, DP&L requested that the Commission authorize two adjustments to the TCRR-N. First, DP&L requested authority to include in the TCRR-N any Operating Reserves costs that are assigned to DP&L, solely as a transmission owner.¹ Second, DP&L sought authority to transfer to the TCRR-N a potential future under-recovery balance that may exist for the Transmission Cost Recovery Rider–Bypassable (“TCRR-B”) as of January 1, 2016, and any future adjustments to TCRR-B costs incurred prior to January 1, 2016.²

¹ Application at 2.

² *Id.* at 3.

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 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

In support of this 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. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU"), including DP&L.

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. To this end, IEU-Ohio has worked to produce legislative, regulatory, and market outcomes that are consistent with the State policy contained in R.C. 4928.02.

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' Ohio 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 to IEU-Ohio members' facilities.

Respectfully submitted,

/s/ Matthew R. Pritchard

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 27th day of April 2015, via electronic transmission.

/s/ Matthew R. Pritchard

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ATTORNEY EXAMINERS

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Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio
electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio