

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Ohio)	
Development Services Agency for an Order)	
Approving Adjustments to the Universal)	Case No. 15-1046-EL-USF
Service Fund Riders of Jurisdictional Ohio)	
Electric Distribution Utilities.)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY’S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy (“OPAE”) hereby respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned matter pursuant to Revised Code §4903.221 and Rule 4901-1-11 of the Commission’s Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute or by the provisions of the Commission’s Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this matter pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulation contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application made by the Ohio Development Services Agency (“ODSA”) proposes to adjust the Universal Service Fund (“USF”) riders of Ohio jurisdictional electric distribution utilities.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in this matter.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in this matter. Additionally, OPAE includes as members non-profit organizations that will be affected by the application.¹ Many of OPAE’s members are community action agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

Economic Opportunity Act of 1964, community action is charged with advocating for low-income residents of their communities.

OPAE's primary interest in this case is to protect the interests of low and moderate income Ohioans and OPAE members whose provision of service will be affected by this application. The USF rider permits the collection of revenues necessary to fund the bill payment assistance and demand reduction programs that make up the low-income assistance programs for electric service authorized by Ohio law. OPAE members serve a variety of roles as grantees and contractors of ODSA in the operation of these programs including, but not limited to: client intake, client counseling, consumer education services, emergency bill payment assistance, targeted energy efficiency services, and other functions related to program operations. The level of funding provided to these programs, which, in turn, provide services to eligible low-income households, will be directly affected by the decisions made in this docket. Further, OPAE members are electric distribution customers of Ohio's electric distribution utilities and will be subject to the USF riders approved in this case. OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this case.

For the above reasons, OPAE has a direct, real and substantial interest in this matter. The matter will have a major impact on the adequacy of funding for low-income programs, the affordability of electric service for low-income households, and the long-term costs of the low-income assistance programs. The disposition of this matter may impair or impede the ability of OPAE to protect its interests. No other party to the matter will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate and service provider to low-income residential customers and a non-profit, non-residential customer group. No other

party represents this group of interests. OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by this application.

Therefore, OPAE is entitled to intervene in this matter with the full powers and rights granted by statute and by the provisions of the Commission's Codes of Rules and Regulations to intervening parties.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served electronically upon the following persons identified below in this case on this 23rd day of June 2015.

/s/Colleen L. Mooney
Colleen L. Mooney

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy