

FAX

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the 2014 Review of the)
Distribution Investment Rider Contained in) Case No. 15-66-EL-RDR
the Tariff of Ohio Power Company.)

MOTION TO INTERVENE OF
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP

Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in this matter with the full powers and rights granted to intervening parties. OMAEG has a real and substantial interest that may be adversely affected by this proceeding and that interest cannot be adequately represented by any existing parties. Because OMAEG satisfies the standard for intervention set forth in the Commission's rules and by statute, the motion should be granted. A memorandum in support is attached.

Respectfully submitted,



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Ohio Adm. Code 4901-1-11 permits intervention by a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede its ability to protect that interest and whose interest is not adequately represented by an existing party. Likewise, R.C. 4903.221 authorizes intervention where a party:

¹ See *In the Matter of the 2014 Review of the Distribution Investment Rider Contained in the Tariff of Ohio Power Company*, Case No. 15-66-EL-RDR, Entry at 1 (March 18, 2015).

² *Id.*

³ See Baker Tilly Compliance Audit of the Distribution Investment Rider of the Ohio Power Company for the Period of January 1, 2014 to December 31, 2014, Case No. 15-66-EL-RDR (August 6, 2015).

⁴ See *Staff Comments*, Case No. 15-66-EL-RDR (August 6, 2015).

may be adversely affected by the proceeding; will contribute to a full development and equitable resolution of factual issues; and will not unduly prolong or delay the proceedings.

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work directly with elected officials, regulatory agencies, the judiciary, and the media to provide education and information to energy consumers, regulatory boards and suppliers of energy; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. OMAEG members purchase electric power services from AEP-Ohio, pay for Rider DIR, and will be affected by the Commission's determination in this proceeding. OMAEG has been an active participant in AEP-Ohio's electric security plan proceedings where Rider DIR has been established.⁵ OMAEG has also participated in other cases involving AEP-Ohio's rider filings.⁶

OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMAEG is regularly and actively involved in Commission proceedings and, as in previous proceedings, OMAEG's unique knowledge and perspective will contribute to the full development and equitable resolution of the factual issues

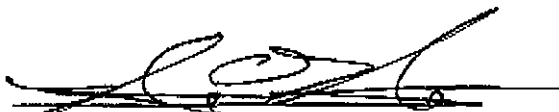
⁵ See *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, et al.*, Case No. 11-346-EL-SSO, et al., Entry at 4 (March 23, 2011) (granting OMAEG's motion to intervene).

⁶ See, e.g., *In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider, et al.*, Case No. 14-1693-EL-RDR, et al., Entry at 3-4 (September 15, 2015) (granting OMAEG's motion to intervene) and *In the Matter of the Application of Ohio Power Company to Adopt a Final Implementation Plan for the Retail Stability Rider*, Case No. 14-1186, Entry at 2 (October 30, 2014) (same).

in this proceeding. OMAEG's interest will not be adequately represented by other parties to the proceeding and its timely intervention will not unduly delay or prolong the proceeding.

Because OMAEG satisfies the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11, it is authorized to intervene with the full powers and rights granted by the Commission to intervening parties. OMAEG respectfully requests that the Commission grant this motion for leave to intervene and that OMAEG be made a full party of record.

Respectfully submitted,

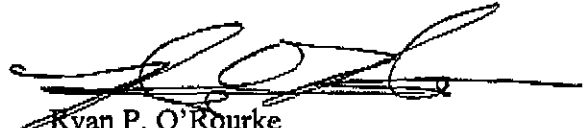
A handwritten signature in black ink, appearing to read 'Kimberly W. Bojko', is written over a horizontal line.

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Counsel for the OMAEG

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on November 16th, 2015.



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