

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of its Electric Security Plan.	) ) )	Case No: 16-395-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	) ) )	Case No. 16-396-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	) ) )	Case No. 16-397-EL-AAM

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**MOTION TO INTERVENE OF  
THE MID-ATLANTIC RENEWABLE ENERGY COALITION**

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Pursuant to Ohio Revised Code (“R.C.”) Section 4903.221 and Ohio Administrative Code (“O.A.C.”) Rule 4901-1-11, the Mid-Atlantic Renewable Energy Coalition (“MAREC”) respectfully moves for leave to intervene in the above-captioned proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant this Motion to Intervene because MAREC has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede MAREC’s ability to protect that interest. MAREC believes that its participation will not unduly prolong or delay these proceedings and that MAREC will significantly contribute to the full development and equitable resolution of the issues in these proceedings. Additionally, MAREC’s interests will not be adequately represented by other parties in these proceedings. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, MAREC respectfully requests that the Commission grant this Motion to Intervene.

Respectfully Submitted,

/s/ Raymond D. Seiler

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**MEMORANDUM IN SUPPORT**

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The above-captioned proceedings were initiated by The Dayton Power and Light Company (“DP&L”) on February 22, 2016. DP&L initiated these proceedings in order to obtain Commission review and approval of its Standard Service Offer to be completed via the Electric Security Plan (“ESP”) proposed by DP&L.

By Entry dated April 11, 2016, the Commission established a procedural schedule for its consideration of the ESP requiring that impacted parties file motions to intervene by June 30, 2016. Thus, MAREC’s submission of this Motion is timely.

MAREC should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests in the proceedings. MAREC is a coalition of diverse wind developers, turbine manufacturers, and public interest organizations formed to educate policy makers and the general public about renewable energy issues in the PJM Interconnection, LLC territory. MAREC also collaborates with other renewable energy industry partners. MAREC’s mission is to ensure that wind power establishes itself as one of the region’s leading energy

resources, providing substantial environmental and economic benefits. MAREC is concerned that the ultimate resolution of the matters to be addressed in these proceedings could have a substantial effect on the development of wind energy and other forms of renewable energy throughout the state and region.

Consistent with the requirements of R.C. Section 4903.221 and O.A.C. Rule 4901-1-11, MAREC is a real party in interest, whose interest is not represented by existing parties. MAREC will contribute to the just and expeditious resolution of the issues and concerns that are set forth in these proceedings and its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party. MAREC's participation will help ensure that the proceedings are fair to its membership. Therefore, MAREC respectfully requests that its Motion to Intervene be granted.

Respectfully Submitted,

/s/ Raymond D. Seiler  
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***Attorneys for Mid-Atlantic Renewable  
Energy Coalition***

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Intervene and Memorandum in Support was served by electronic mail upon the following Parties of Record on this 8th day of June, 2016.

/s/ Raymond D. Seiler  
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Summary: Motion to Intervene electronically filed by Mr. Raymond D. Seiler on behalf of Mid-Atlantic Renewable Energy Coalition