

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of The Dayton Power and Light Company to Increase its Rates for Electric Distribution Service.</b>	<b>:</b>	<b>Case No. 15-1830--EL-AIR</b>
	<b>:</b>	
	<b>:</b>	
<b>In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority.</b>	<b>:</b>	<b>Case No. 15-1831—EL-AAM</b>
	<b>:</b>	
	<b>:</b>	
<b>In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs</b>	<b>:</b>	<b>Case No. 15-1832—EL-ATA</b>
	<b>:</b>	
	<b>:</b>	

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**UTILITY WORKERS UNION OF AMERICA, LOCAL 175'S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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Utility Workers Union of America, Local 175 ("Local 175") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to R.C. § 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations. The reasons for granting this Motion to Intervene are contained in the Memorandum set forth below.

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

Utility Workers Union of America, Local 175 ("Local 175") should be permitted to intervene in these matters pursuant to R. C. § 4903.221 and the Commission's Code of Rules and Regulations contained in 4901-1-11.

Local 175 is a tax exempt association representing a large number of the employees of the Dayton Power and Light Company ("DP&L") in both its distribution and generation services whose members will be affected by any decision rendered in this matter. The bargaining unit employees of DP&L represented by Local 175 are concerned about the potential impact any

decision reached in this matter will have on their current and future employment. Local 175 wants to make sure that the interests and rights of the bargaining unit employees its represents are properly heard, considered and protected throughout these proceedings. Local 175 has previously participated in cases before the PUCO involving DP&L.


Local 175, as the sole and exclusive collective bargaining representative of a large number of the bargaining unit employees of DP&L, has a direct, real and substantial interest in these proceedings. Any decision rendered by the PUCO in this matter will undoubtedly have some effect on the current and future employment of the bargaining unit employees represented by Local 175. No other party can, or will, adequately represent the interest of the bargaining unit employees represented by Local 175 in this matter.

Additionally, the participation of Local 175, as a representative of the bargaining unit employees of DP&L, will not cause undo delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised in these proceedings.

Therefore, Local 175 is entitled to intervene in these matters with the full powers and rights granted by statute and by the Commission's Code of Rules and Regulations to intervening parties.

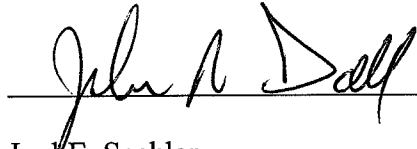
Respectfully submitted,

**DOLL, JANSEN & FORD**

  
John R. Doll - 0020529  
Matthew T. Crawford - 0089205  
111 W. First St., Suite 1100  
Dayton, OH 45402-1156  
(937) 461-5310, (937) 461-7219 (fax)  
jdoll@djflawfirm.com  
mcrawford@djflawfirm.com  
Attorneys for Utility Workers of America  
Local 175

**CERTIFICATE OF SERVICE**

A copy of the foregoing document was served upon the following individuals by electronic filing on this 14<sup>th</sup> day of June, 2016.



Thomas McNamee  
Natalia messenger  
Public Utilities Commission of Ohio  
30 East Broad Street, 16<sup>th</sup> Floor  
Columbus, OH 43215-3793  
Telephone : 614-466-4397  
Telecopier: 614-644-8764  
Email:  
Thomas.mcnamee@ohioattorneygeneral.gov  
Natalia.messenger@ohioattorneygeneral.gov

Joel E. Sechler  
Danielle M. Ghiloni  
Carpenter Lipps & Leland LLP  
280 North High Street, Suite 1300  
Columbus, OH 43215  
Email: Sechler@carpenterlipps.com  
Ghiloni@carpenterlipps.com

Attorneys for The Kroger Company

Attorneys for PUCO Staff

Jodi Bair (Counsel of Record)  
Ajay Kumar  
Christopher Healey  
Assistant Consumers' Counsel  
Office of The Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215-3485  
Email: Jodi.bair@occ.ohio.gov  
Ajay.kumar@occ.ohio.gov  
Christopher.healey@occ.ohio.gov

David F. Boehm  
Michael L. Kurtz  
Kurt J. Boehm  
Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
Email: dboehm@BKLawfirm.com  
mkurtz@BKLawfirm.com  
kboehm@BKLawfirm.com  
jkylercohn@BKLawfirm.com

Attorneys for Appellant  
Ohio of the Ohio Consumers' Counsel

Attorneys for Ohio Energy Group

Frank P. Darr (Counsel of Record)  
Matthew R. Pritchard  
McNees Wallace & Nurick  
21 East State Street, 17th Floor  
Columbus, OH 43215  
Email: fdarr@mwncmh.com  
mpritchard@mwncmh.com

Attorneys for Appellant  
Industrial Energy Users – Ohio

Madeline Fleisher  
Environmental Law & Policy Center  
21 West Broad Street, Suite 500  
Columbus, OH 43215  
Email: mfleisher@elpc.org

Robert Kelter (Senior Attorney)  
Justin Vickers (Staff Attorney)  
Environmental Law & Policy Center  
55 East Wacker Drive, Suite 1600  
Chicago, IL 60601  
Email: rkelter@elpc.org  
jvickers@elpc.org

Attorneys for the Environmental Law &  
Policy Center

Steven D. Lesser  
James F. Lang  
N. Trevor Alexander  
Calfee, Halter & Griswold LLP  
41 South High Street  
1200 Huntington Center  
Columbus, OH 43215  
Email: slesser@calfee.com  
jlang@calfee.com  
talexander@calfee.com

Attorneys for Honda America Mfg., Inc. and  
The City of Dayton

Kimberly W. Bojko (Counsel of Record)  
Ryan P. O'Rourke  
Carpenter Lipps & Leland LLP  
280 North High Street, Suite 1300  
Columbus, OH 43215  
Email: Bojko@carpenterlipps.com  
O'Rourke@carpenterlipps.com

Attorneys for The Ohio Manufacturers'  
Association Energy Group

Trent Dougherty (Counsel of Record)  
1145 Chesapeake Avenue, Suite 1  
Columbus, OH 43212  
Email: tdougherty@the OEC.org

John Finnigan  
Senior Regulatory Attorney  
Environmental Defense Fund  
128 Winding Brook Lane  
Terrace Park, OH 45174  
Email: jfinnigan@edf.com

Attorneys for the Ohio Environmental Council  
and Environmental Defense Fund

Robert Dove  
P.O. Box 13442  
Columbus, OH 43213  
Email: rdove@attorneydove.com

Samantha Williams (Staff Attorney)  
Natural Resources Defense Council  
20 N. Wacker Drive, Suite 1600  
Chicago, IL 60606  
Email: swilliams@nrdc.com

Attorneys for Natural Resources  
Defense Council

Kurt P. Helfrich  
Stephanie M. Chmiel  
Michael D. Austin  
Thompson Hine LLP  
41 South High Street, Suite 1700  
Columbus, OH 43215-6101  
Email: Kurt.Helfrich@ThompsonHine.com  
Stephanie.Chmiel@ThompsonHine.com  
Michael.Austin@ThompsonHine.com

Attorneys for Buckeye Power, Inc.

Derrick Price Williamson  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
Email: dwilliamson@spilmanlaw.com

Carrie M. Harris  
Spilman Thomas & Battle, PLLC  
310 First Street, Suite 1100  
P.O. Box 90  
Roanoke, VA 24002-0090  
Email: charris@spilmanlaw.com

Lisa M. Hawrot  
Spilman Thomas & Battle, PLLC  
Century Centre Building  
1233 Main Street, Suite 4000  
Wheeling, WV 26003  
Email: lhawrot@spilmanlaw.com

Steve W. Chriss  
Senior Manager, Energy Regulatory Analysis  
Greg Tillman  
Senior Manager, Energy Regulatory Analysis  
Wal-Mart Stores, Inc.  
2001 SE 10th Street  
Bentonville, AR 72716-0550  
Email: Stephen.Chriss@walmart.com  
Greg.Tillman@walmart.com

Attorneys for Wal-Mart Stores East, LP  
and Sam's East, Inc.

Colleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
P.O. Box 1793  
Findlay, OH 45839-1793  
Email: cmooney@ohiopartners.org

Attorney for Ohio Partners for  
Affordable Energy

Joseph Olikier  
IGS Energy  
6100 Emerald Parkway  
Dublin, OH 43016  
Email: joliker@igsenergy.com

Attorney for IGS Energy

Richard L. Sites  
Ohio Hospital Association  
155 East Broad Street, 3rd Floor  
Columbus, OH 43215-3620  
Email: rick.sites@ohiohospitals.org

Lt Col John C. Degnan  
Thomas A. Jernigan  
Ebony M. Payton  
Federal Executive Agencies (FAE)  
139 Barnes Drive, Suite 1  
Tyndall AFB FL 32403  
Email: John.Degnan@us.af.mil  
Thomas.Jernigan.3@us.af.mil  
Ebony.Payton.ctr@us.af.mil

Attorney for Federal Executive Agencies

Ellis Jacobs  
Advocates for Basic Legal Equality, Inc.  
130 West Second Street, Suite 700 East  
Dayton, OH 45402  
Email: ejacobs@ablelaw.org

Attorney for The Edgemont Neighborhood  
Coalition

Jacob J. Schlesinger  
Keyes, Fox & Wiedman, LLP  
1580 Lincoln Street #880  
Denver, CO 80203  
Email: jschlesinger@kfwlaw.com

Beren Argetsinger  
Keyes, Fox & Wiedman, LLP  
401 Harrison Oaks Boulevard, Suite 100  
Cary, NC 27513  
Email: bargetsinger@kfwlaw.com

Dylan F. Borchers  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Email: dborchers@bricker.com

Attorneys for Energy Freedom Coalition of  
America, LLC

Jeffrey W. Mayes  
Monitoring Analytics, LLC  
2621 Van Buren Avenue, Suite 160  
Valley Forge Corporate Center  
Eagleville, PA 19403  
Email:  
Jeffrey.mayes@monitoringanalytics.com

Evelyn R. Robinson  
PJM Interconnection, LLC  
2750 Monroe Blvd  
Audubon, PA 19403  
Email: evelyn.robinson@pjm.com

Attorneys for Monitoring Analytics, LLC as  
The Independent Market Monitor for PJM

Ryan P. O'Rourke  
Carpenter Lipps & Leland LLP  
280 Plaza, Suite 1300  
280 North High Street  
Columbus, OH 43215  
Email: O'Rourke@carpenterlipps.com

Attorney for The Kroger Co.

Matthew W. Warnock  
Dylan F. Borchers  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Email: mwarnock@bricker.com  
dborchers@bricker.com

Attorneys for The Ohio Hospital Association

Kevin R. Schmidt  
88 East Broad Street, Suite 1770  
Columbus, OH 43215  
Email: Schmidt@sppgrp.com

Attorney for The Energy Professionals of Ohio

Joel E. Sechler (Counsel of Record)  
Carpenter Lipps & Leland  
280 N. High St., Suite 1300  
Columbus, OH 43215  
Email: Sechler@carpenterlipps.com

Gregory J. Poulos  
EnerNOC, Inc.  
P.O. Box 29492  
Columbus, OH 43229  
Email: gpoulos@enernoc.com

Attorneys for EnerNOC, Inc.

William J. Michael (Counsel of Record)  
Kevin F. Moore  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215-3485  
Email: William.Michael@occ.ohio.gov  
Kevin.Moore@occ.ohio.gov

Attorneys for the Ohio Consumers' Counsel

Michael D. Dortch  
Richard R. Parsons  
Kravitz, Brown & Dortch, LLC  
65 East State Street, Suite 200  
Columbus, OH 43215  
Email: mdortch@kravitzllc.com  
rparsons@kravitzllc.com

Attorneys for Noble Americas  
Energy Solutions LLC

Michael J. Settineri  
Stephen M. Howard  
Gretchen L. Petrucci  
Ilya Batikov  
Vorys, Sater, Seymour and Pease LLP  
52 E. Gay Street  
Columbus, OH 43215  
Email: mjsettineri@vorys.com  
smhoward@vorys.com  
glpetrucci@vorys.com  
ibatikov@vorys.com

Attorneys for Dynegy Inc. and  
PJM Power Providers Group

Michelle Grant, Senior Corporate Counsel  
Dynegy Inc.  
601 Travis Street, Suite 1400  
Houston, TX 77002  
Email: michelle.d.grant@dynegy.com

Attorneys for Dynegy Inc.

Amy B. Spiller  
Elizabeth H. Watts  
Duke-Energy Ohio, Inc.  
139 East Fourth Street  
1303-Main  
Cincinnati, OH 45202  
Email: amy.spiller@duke-energy.com  
elizabeth.watts@duke-energy.com

Attorneys for Duke-Energy Ohio, Inc.

Richard C. Sahli  
Richard C. Sahli Law Office, LLC  
981 Pinewood Lane  
Columbus, OH 43230-3662  
Email: rsahli@columbus.rr.com

Attorney for Sierra Club

Glen Thomas  
1060 First Avenue, Suite 400  
King of Prussia, PA 19406  
Email: gthomas@gtpowergroup.com

Sharon Theodore  
Electric Power Supply Association  
1401 New York Ave. NW 11th Floor  
Washington, DC  
Email: stheodore@epsa.org

Laura Chappelle  
201 North Washington Square, Suite 910  
Lansing, MI 48933  
Email: laurac@chappelleconsulting.net

Attorneys for PJM Power Providers Group

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Summary: Motion Motion to Intervene and Memorandum in Support electronically filed by Mr. John R. Doll on behalf of Utility Workers Union of America Local 175