

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )  
Power Company for Approval of Its Energy ) Case No. 16-574-EL-POR  
Efficiency/Peak Demand Reduction Portfolio )  
Plan )

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**MOTION TO INTERVENE OF  
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

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Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code, 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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**MEMORANDUM IN SUPPORT**

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Pending before the Public Utilities Commission of Ohio (Commission) is an application filed by the Ohio Power Company (AEP Ohio) for approval of its proposed 2017 through 2019 Energy Efficiency/Peak Demand Reduction (EE/PDR) Program Portfolio Plans (POR Plan). As explained in more detail below, OMAEG has a real and substantial interest in AEP Ohio's proposed POR plans.

Rule 4901-1-1, Ohio Administrative Code, 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. Additionally, Section 4903.221, Revised Code, authorizes intervention where a party: 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.

The Ohio Manufacturers' Association Energy Group (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 works 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, have previously participated in proceedings involving AEP Ohio,<sup>1</sup> and will be affected by the Commission's determination in this proceeding.

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. It 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 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 Section 4903.221, Revised Code and Rule 4901-1-11, Ohio Administrative Code, 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.

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<sup>1</sup> See e.g., *In the Matter of the Application of Columbus Southern Power Company for Approval of its Portfolio Plan and Request for Expedited Consideration et al.*, Case No. 09-1089-EL-POR et al. (November 12, 2009); *In the Matter of the Application of Columbus Southern Power Company for Approval of its Program Portfolio Plan and Request for Expedited Consideration et al.*, Case No. 11-5568-EL-POR et al. (November 29, 2011); *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to § 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan et al.*, Case No. 13-2385-EL-SSO et al. (December 20, 2013); *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. (October 3, 2014).

Respectfully submitted,

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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 June 24, 2016.

/s/ Danielle Ghiloni Walter  
Danielle Ghiloni Walter

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Summary: Motion To Intervene Of The Ohio Manufacturers' Association Energy Group  
electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group