

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of The
Dayton Power and Light Company for
Approval of its Energy Efficiency/Peak
Demand Reduction Portfolio Plan for
2017 through 2019**

) **Case No. 16-0649-EL-POR**
)
) **Case No. 16-1369-EL-WVR**
)
)
)
)
)
)
)
)
)
)

PEOPLE WORKING COOPERATIVELY, INC.'S MOTION TO INTERVENE

Pursuant to Ohio Revised Code ("RC") § 4903.221 and Ohio Administrative Code ("OAC") 4901-1-11, People Working Cooperatively, Inc. ("PWC") respectfully moves to intervene in the above-captioned proceedings for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Devin D. Parram

Devin D. Parram (0082507)

Counsel of Record

Email: dparram@taftlaw.com

Direct: (614) 334-6117

TAFT STETTINIUS & HOLLISTER LLP

65 East State Street, Suite 1000

Columbus, Ohio 43215

Telephone: (614) 221-2838

Facsimile: (614) 221-2007

***Attorney for People Working
Cooperatively, Inc.***

MEMORANDUM IN SUPPORT

PWC respectfully submits that it is entitled to intervene in these proceedings because PWC has a real and substantial interest in the proceedings, the disposition of which may impair or impede PWC's ability to protect that interest. For purposes of considering requests to intervene in a Commission proceeding, the OAC provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: ... (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

OAC 4901-1-11(A).

Further, OAC 4901-1-11(B) provides that the Commission, in ruling upon motions to intervene in its proceedings, shall consider the following criteria:

(1) The nature and extent of the prospective intervenor's interest; (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case; (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues; and (5) The extent to which the person's interest is represented by existing parties.

PWC is a unique non-profit organization that has served customers in Ohio for over forty (40) years. PWC provides weatherization and energy management services to low-income residential consumers. It owns and maintains the necessary tools and equipment to deliver its services and employs a full-time staff of skilled construction and administrative personnel, both of which greatly enhance PWC's ability to provide excellent and cost efficient services. PWC broadens its ability to provide client services by employing utility funding to obtain additional funding from other entities. PWC provides services in The Dayton Power and Light Company's ("DP&L") service territory and has a direct interest in DP&L's energy efficiency programs.

Accordingly, PWC has a direct, real, and substantial interest in this proceeding, and may be substantially impacted by the outcome of this proceeding.

Without PWC's ability to fully participate in this proceeding, PWC's interest will be prejudiced because no other party participating in this proceeding represents PWC's unique interests. Inasmuch as others participating in this proceeding cannot adequately protect PWC's interests, it would be inappropriate to make any final determination in this proceeding without PWC's participation. Furthermore, PWC's intervention will not delay this proceeding.

For the reasons set forth above, PWC respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted,

/s/ Devin D. Parram

Devin D. Parram (0082507)

Counsel of Record

Email: dparram@taftlaw.com

Direct: (614) 334-6117

TAFT STETTINIUS & HOLLISTER LLP

65 East State Street, Suite 1000

Columbus, Ohio 43215

Telephone: (614) 221-2838

Facsimile: (614) 221-2007

***Attorney for People Working
Cooperatively, Inc.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *People Working Cooperatively, Inc.'s Motion to Intervene* was served upon the parties of record in this proceeding by electronic mail this 8th day of July, 2016.

/s/ Devin D. Parram

Devin D. Parram

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/8/2016 4:19:07 PM

in

Case No(s). 16-0649-EL-POR, 16-1369-EL-WVR

Summary: Motion PWC Motion to Intervene electronically filed by Mr. Devin D. Parram on behalf of People Working Cooperatively