

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of
Ohio Power Company for Approval of
its Program Portfolio Plan**

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Case No. 16-574-EL-POR

Motion to Intervene of the Ohio Farm Bureau Federation

The Ohio Farm Bureau Federation (“OFBF”) pursuant to Section 4903.221 of the Ohio Revised Code (“ORC”) and Section 4901-1-11 of the Ohio Administrative Code (“OAC”), moves to intervene in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth in the accompanying memorandum of support.

For the reasons stated below, OFBF requests that its motion for intervention be granted and that it be made a full party of record.

Respectfully Submitted,

/s/ Chad A. Endsley

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Ohio Power Company for Approval of)	Case No. 16-574-EL-POR
its Program Portfolio Plan)	

**Memorandum in Support of Motion to Intervene
of the Ohio Farm Bureau Federation**

The Ohio Power Company (“AEP Ohio”) is identified as a “public utility” under ORC 4905.02(A), an “electric light company” under ORC 4905.03(C), an “electric distribution utility” under ORC 4928.01(A)(6), and an “electric utility” under ORC 4928.01(A)(11).

In Amended Substitute Senate Bill No. 221 (“S.B. 221”), the Ohio General Assembly required electric distribution utilities such as AEP Ohio to meet benchmarks for energy efficiency and peak demand reductions (“EE/PDR”). These EE/PDR benchmarks are codified in ORC 4928.66.

The Public Utilities Commission of Ohio (“PUCO” or “Commission”) has adopted rules for implementing EE/PDR benchmarks. The rules require electric utilities under their jurisdiction to design and propose a comprehensive EE/PDR portfolio or action plan (“Action Plan”) and benchmarks that incorporate a range of programs and strategies that promote innovation, opportunities and market access for all customer classes. Requirements for EE/PDR Action Plans are detailed in OAC 4901:1-39-04.

In PUCO Case Number 08-0197-EL-SSO the Commission approved AEP Ohio’s first Electric Security Plan (“ESP”) and EE/PDR Cost Recovery Rider. In PUCO Case Numbers 11-346-EL-SSO and 123-2385-EL-SSO, the Commission approved continuation of the ESP and Rider.

In PUCO Case Numbers 09-1089-EL-POR and 09-1090-EL-POR the Commission approved AEP Ohio's first Action Plan. This plan was in effect from 2009-2011.

In PUCO Case Numbers 11-5568-EL-POR and 11-5569-EL-POR the Commission approved AEP Ohio's second Action Plan. This plan was in effect from 2012-2014.

In 2014, the Ohio General Assembly passed Amended Substitute Senate Bill No. 310 ("S.B. 310"), which froze the statutory EE/PDR benchmarks for 2015 and 2016 at 2014 levels and gave each electric utility the option of extending its then-current Action Plan through 2016 or amending its Action Plan to scale back to the frozen standard levels. AEP Ohio elected to continue its 2012-2014 Action Plan unchanged through 2016. Absent new legislation, the freeze enacted by S.B. 310 will be lifted in 2017, and the original S.B. 221 benchmarks again will apply.

On June 15, 2016 AEP Ohio submitted an application for approval of its new Action Plan. If approved, the plan will be in effect from 2017-2019.

AEP Ohio convened a diverse group of stakeholders known as the AEP Ohio EE/PDR Collaborative ("Collaborative") to help develop its EE/PDR Action Plan. Collaborative members include representatives from state government, business, industry, healthcare, and education, as well as consumer, low-income, and environmental advocates. The Ohio Farm Bureau Federation has served as a member of this group. The Collaborative has met regularly since 2008. Collaborative members have provided substantial input on each of AEP Ohio's Action Plans.

OFBF Should be Granted Intervention as a Party of Record

Ohio Revised Code Section 4903.221 authorizes intervention where a party may be adversely affected by the proceeding. In authorizing intervention, the Commission must take into consideration: the nature and extent of the prospective intervenor's interest; the legal position advanced by the prospective intervenor and its probable relation to the merits of the case,

whether the intervention will unduly prolong or delay the proceedings, and whether the prospective intervenor will significantly contribute to a full development and equitable resolution of the factual issues. ORC 4903.221(B). Pursuant to OAC Rule 4901-1-11, OFBF moves to intervene in this proceeding as a full party of record.

The Ohio Farm Bureau Federation (“OFBF”) is a non-profit organization representing agricultural and rural community interests at the state and local levels. Over 191,000 member families belong to the organization statewide. OFBF members are found in every county of the state, including the 61 counties served by AEP Ohio.

Many Farm Bureau members are involved in farm and agribusiness activities - food processing, commodity processing/conditioning/handling, animal husbandry, and greenhouse operations. Some members are involved in larger scale industries and manufacturing while others have small business enterprises – restaurants, markets, cleaners and other services. All are residential energy consumers.

On the state level, OFBF has worked with utilities, energy service providers, the PUCO, other government agencies and interested citizens groups to explore strategies and introduce new technologies to help consumers and communities control energy costs. Some of this work spans several decades. The organization has been involved in a variety of programs concerning aggregation, interconnection, on-site generation, power siting and utility system upgrades.

On the local level, county Farm Bureaus have worked with utilities, energy service providers, government agencies and community stakeholders to explore how energy development projects should be implemented at the individual customer and neighborhood levels.

Farm Bureau utilizes its extensive policy development process to generate stakeholder dialogue and action that includes a variety of groups with varied interests and concerns. Farm

Bureau leaders at all levels understand and appreciate the importance of effective PDR/EE programs as a vital first step in helping individual energy consumers and communities fully access and participate in all energy development initiatives. This perspective cannot be provided by another existing party.

Farm Bureau is involved as a participant in the AEP Ohio EE/PDR Collaborative. The organization has worked with others to help develop the utility's EE/PDR Action Plan. As part of this process, AEP Ohio worked with county Farm Bureau leaders to conduct research and audits to better understand the energy needs/requirements of farms and agribusinesses within their utility service area. This work is described as an agricultural pilot project in AEP Ohio's second Action Plan, approved by the Commission in Case Numbers 11-5568-EL-POR and 11-5569-EL-POR. OFBF plans to continue work with the company and other interested community stakeholders as it expands these programs in the new Action Plan being considered by the Commission.

OFBF fully understands and appreciates the rules and regulations governing the PUCO evaluation process. OFBF will continue to share its experiences and unique perspective with the Commission as considers this new Action Plan. OFBF's participation in this process will not cause undue delay, will not unjustly prejudice any existing party and will contribute to the full development and equitable resolution of the factual issues. As the state's largest general farm organization, representing the constituency of Ohio's top industry, OFBF's unique perspective is important to the merits of the case and cannot otherwise be provided by other parties.

Given the diverse, yet unique interests of its members, experience with energy development issues and support for collaboration, the Ohio Farm Bureau Federation submits that good cause exists to grant it leave to intervene in this proceeding.

Conclusion

For the reasons set forth above, the Ohio Farm Bureau Federation requests that its motion to intervene be granted and that it be made a full party of record.

Respectfully Submitted,

/s/ Chad A. Endsley

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Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 26th day of July 2016 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.

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Summary: Motion to Intervene of the Ohio Farm Bureau Federation electronically filed by Mr. Chad A Endsley on behalf of Ohio Farm Bureau Federation, Inc.