

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Revised Code, in the Form of an Electric Security Plan.)	
)	
)	Case No. 16-1852-EL-SSO
)	
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.)	
)	
)	Case No. 16-1853-EL-AAM
)	

MOTION TO INTERVENE OF PAULDING WIND FARM II LLC

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221, Ohio Administrative Code (“OAC”) Rule 4901-1-11, and the Attorney Examiner Entry dated January 24, 2014, Paulding Wind Farm II LLC (“Paulding II”) moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant Paulding II leave to intervene because Paulding II has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede Paulding II’s ability to protect that interest.

MEMORANDUM IN SUPPORT

On December 20, 2013, Ohio Power Company (“AEP Ohio”) filed an Application in Case No. 13-2385-EL-SSO to establish its third electric security plan (“ESP III”). Also on December 20, 2013 AEP Ohio filed an Application for approval of certain accounting authority in Case No. 13-2386-EL-ATA. AEP Ohio’s ESP III application was approved as modified by the Commission on February 25, 2015.

AEP Ohio also filed an application on October 3, 2014 in Case No. 14-1693-EL-RDR, to expand its purchase power agreement (“PPA Case”), which the Commission approved the stipulation with modifications on March 31, 2016. By Entry dated September 7, 2016, the attorney examiner ordered AEP Ohio to refile its application and supporting testimony to extent the ESP III consistent with approved PPA, and on December 23, 2016, AEP Ohio filed an amended application along with supporting testimony. Paulding Wind II was granted intervention on April 21, 2014 in the ESP III.

Paulding II is a Delaware limited liability company and a subsidiary of EDP Renewables North America LLC (formerly Horizon Wind Energy LLC) which develops, constructs, owns, and operates wind farms throughout North America. Further, Paulding II is a supplier of renewable energy resources to AEP Ohio, in which Paulding II’s costs are recovered through AEP Ohio’s Rider AER. Paulding II is seeking intervention in this case to support its interest in ensuring the operation of Rider AER, as proposed by AEP Ohio in its filing.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, Paulding II is a real party in interest in this proceeding. Paulding II submits that its interest is not represented by existing parties and thus its interests are not now represented. Paulding II’s participation will not unduly delay this proceeding or prejudice any existing party. By granting Paulding II’s motion to intervene, the Commission will permit Paulding II to contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings.

Accordingly, Paulding II respectfully requests the Commission to determine that it has a real and substantial interest in these proceedings and should grant its motion to intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
PAULDING WIND FARM II LLC



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 28th day of November 2016 *via* electronic mail.



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Summary: Motion to Intervene of Paulding Wind Farm II LLC electronically filed by Teresa Orahoad on behalf of Dylan F. Borchers