BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	:	**Case No. 16-0395-EL-SSO**
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	:	**Case No. 16-0396-EL-ATA**
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code Sect. 4905.13	:	**Case No. 16-0397-EL-AAM**

MONROE TOWNSHIP'S MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT

Monroe Township ("Township") hereby respectfully moves the Public Utilities Commision 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

Township 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.

Dayton Power and Light Company ("DP&L") operates a distribution and generation services facility ("facility") located within the boundaries of Township. DP&L recently announced that it intends to close the facility located in the Township which will have a detrimental economic impact upon the Township. Township is a political subdivision which is concerned

about the potential economic impact any decision reached in this matter will have on its current and future tax revenues generated from DP&L. Township wants to make sure that the interests and rights of the residents within the Township are properly heard, considered and protected throughout these proceedings.

Township has a direct, real and substantial interest in these proceedings. Any decision rendered by the PUCO in this matter will have some effect on the current and future tax revenues of Township. Additionally, the participation of Township in these proceedings 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 herein.

Therefore, Township 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,

ADAMS COUNTY
PROSECUTOR'S OFFICE

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 20th day of January 2017.

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/20/2017 11:02:56 AM

in

Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Mrs. Dana N Whalen on behalf of Monroe Township