

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)	
Company for Authority to Establish a Standard)	Case No. 16-1852-EL-SSO
Service Offer Pursuant to R.C. 4928.143 in the)	
Form of an Electric Security Plan.)	

In the Matter of the Application of Ohio Power)	
Company for Approval of Certain Accounting)	Case No. 16-1853-EL-AAM
Authority.)	

**MOTION TO INTERVENE OF
THE MID-ATLANTIC RENEWABLE ENERGY COALITION**

Pursuant to Ohio Revised Code (“R.C.”) Section 4903.221 and Ohio Administrative Code (“O.A.C.”) Rule 4901-1-11, the Mid-Atlantic Renewable Energy Coalition (“MAREC”) respectfully moves for leave to intervene in the above-captioned proceedings. The Public Utilities Commission of Ohio (“Commission”) should grant this Motion to Intervene because MAREC has a real and substantial interest in these proceedings, and the Commission’s disposition of these proceedings may impair or impede MAREC’s ability to protect that interest. MAREC believes that its participation will not unduly prolong or delay these proceedings and that MAREC will significantly contribute to the full development and equitable resolution of the issues in these proceedings. Additionally, MAREC’s interests will not be adequately represented by other parties in these proceedings. Accordingly, for these reasons and for the reasons set forth

in the Memorandum in Support attached hereto and incorporated herein, MAREC respectfully requests that the Commission grant this Motion to Intervene.

Respectfully Submitted,

/s/ Christine M.T. Pirik

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Coalition***

February 27, 2017

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**MEMORANDUM IN SUPPORT
OF MID-ATLANTIC RENEWABLE ENERGY COALITION'S
MOTION TO INTERVENE**

I. Introduction

The above-captioned proceedings were initiated on September 7, 2016. On November 23, 2016, Ohio Power Company d/b/a AEP Ohio (“AEP Ohio”) filed an amended electric security plan (“ESP”) requesting to extend, with certain modifications, the term of its current ESP, pursuant to R.C. Section 4928.141.

By Entry dated February 7, 2017, the Commission established a procedural schedule for its consideration of AEP Ohio’s application requiring that impacted parties file motions to intervene by March 1, 2017. Thus, MAREC’s submission of this Motion to Intervene is timely.

II. Legal Standard

R.C. Section 4903.221(B) sets forth the criteria the Commission is required to consider in ruling on motions to intervene, which include:

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.

O.A.C. Rule 4901-1-11(A) also provides detail on the statutory intervention criteria and requires that the Commission allow intervention by a person who has a “real and substantial interest in the proceeding” and who “is so situated that the disposition of the proceeding may, as a practical matter, impair or impeded his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.”

III. MAREC Should Be Granted Intervention In These Proceedings

MAREC should be permitted to intervene in the above-captioned proceedings because it has a real and substantial interest in the proceedings. MAREC is a coalition of diverse wind developers, turbine manufacturers, and public interest organizations formed to educate policy makers and the general public about renewable energy issues in the PJM Interconnection, LLC territory. MAREC also collaborates with other renewable energy industry partners. MAREC’s mission is to ensure that wind power establishes itself as one of the region’s leading energy resources, providing substantial environmental and economic benefits. MAREC is concerned that the ultimate resolution of the matters to be addressed in these proceedings could have a substantial effect on the development of wind energy and other forms of renewable energy throughout the state and region.

Consistent with the requirements of R.C. Section 4903.221 and O.A.C. Rule 4901-1-11, MAREC is a real party in interest, whose interest is not represented by existing parties. MAREC will contribute to the just and expeditious resolution of the issues and concerns that are set forth in these proceedings and its participation in these proceedings will not cause undue delay or

unjustly prejudice any existing party. MAREC's participation will help ensure that the proceedings are fair to its membership. Therefore, MAREC respectfully requests that its Motion to Intervene be granted.

Respectfully Submitted,

/s/ Christine M.T. Pirik

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Coalition***

February 27, 2017

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 copy of the foregoing document is also being served upon the persons below via electronic mail this 27th day of February, 2017.

/s/ Christine M.T. Pirik

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Summary: Motion To Intervene of The Mid-Atlantic Renewable Energy Coalition electronically filed by Christine M.T. Pirik on behalf of The Mid-Atlantic Renewable Energy Coalition