

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The	:	
Dayton Power and Light Company to	:	Case No. 15-1830-EL-AIR
Increase its Rates for Electric	:	
Distribution	:	
	:	
In the Matter of the Application of The	:	Case No. 15-1831-EL-AAM
Dayton Power and Light Company for	:	
Accounting Authority.	:	
	:	
In the Matter of the Application of The	:	Case No. 15-1832-EL-ATA
Dayton Power and Light Company for	:	
Approval of Revised Tariffs.	:	

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**MOTION TO INTERVENE OF  
ONE ENERGY ENTERPRISES LLC**

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Pursuant to Ohio Revised Code Section (R.C.) 4903.221 and Ohio Administrative Code (OAC) Rule 4901-1-11, One Energy Enterprises LLC (“One Energy”) moves for leave to intervene in the above-captioned proceedings. One Energy requests that the Public Utilities Commission of Ohio (Commission) grant One Energy’s leave to intervene because One Energy has a real and substantial interest in these proceedings, the Commission’s disposition of these proceedings may impair or impede One Energy’s ability to protect that interest, and One Energy’s participation will not cause undue delay.

## **MEMORANDUM IN SUPPORT**

One Energy, based in Findlay, Ohio, has installed 24 megawatts (MWs) of operating behind-the-meter wind projects for industrial and manufacturing energy customers in Ohio with an additional 10.5 MWs under construction. One Energy is responsible for developing more net metered wind projects in Ohio than all other entities combined. One Energy's projects range from 1.5 MWs to 4.5 MWs in size and its customers include Cooper Farms, Haviland Plastics, Whirlpool Corporation, Ball Corporation, and Marathon Petroleum, among others. Construction for a One Energy project in DP&L's service territory is currently underway and additional prospective projects in DP&L's service territory exist.

One Energy will be affected by the Commission's determination in these matters and should be permitted to intervene in the above-captioned proceedings because it has a real and substantial interest in these proceedings. Pursuant to Attorney Examiner Entry dated March 14, 2018, motions to intervene in this case are due by April 11, 2018, therefore this motion to intervene is timely.

One Energy continues to be involved in efforts at the Commission and through its work with Ohio's electric distribution utilities to promote fair and nondiscriminatory practices and policies for behind-the-meter projects in the State of Ohio while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of the matters in these proceedings do not have a negative impact on industrial and manufacturing customers with behind-the-meter generation or those installing behind-the-meter generation in the State of Ohio. One Energy's substantial interest in these proceedings is not adequately addressed by any other party. One Energy's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings

in this matter are fair to those who have installed or are installing behind-the-meter generation in the State of Ohio.

Accordingly, One Energy respectfully requests the Commission determine that One Energy has a real and substantial interest in these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

Respectfully submitted on behalf of  
ONE ENERGY ENTERPRISES LLC,

/s/ Katie Johnson Treadway

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## **CERTIFICATE OF SERVICE**

The Commission's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a copy of the foregoing Motion to Intervene submitted on behalf of One Energy Enterprises LLC was served upon the parties of record listed below on April 4, 2018 via electronic mail.

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/s/ Katie Johnson Treadway

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**in**

**Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM, 15-1832-EL-ATA**

Summary: Motion to Intervene and Memorandum in Support electronically filed by Ms. Katie Johnson Treadway on behalf of One Energy Enterprises LLC