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#### Via E-FILE

June 5, 2018

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case No. 18-47-AU-COI

Dear Sir/Madam:

Please find attached the MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Encl.

Cc:

Certificate of Service

### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter Of The Commission's Investigation Of The	:	
Financial Impact Of The Tax Cuts And Jobs Act Of 2017 On	:	Case No. 18-47-AU-COI
Regulated Ohio Utility Companies.	:	

## MOTION TO INTERVENTION OF THE THE OHIO ENERGY GROUP

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

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June 5, 2018

COUNSEL FOR THE OHIO ENERGY GROUP

# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter Of The Commission's Investigation Of The
Financial Impact Of The Tax Cuts And Jobs Act Of 2017 On
Regulated Ohio Utility Companies.

: Case No. 18-47-AU-COI

#### MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of its Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Commission. OEG's members purchase large amounts of electric power services from the investor-owned utilities in Ohio. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

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#### **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP (OEG) was sent to the following parties of record *via* electronic transmission this 5<sup>th</sup> day of June, 2018 to the following:

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Case No(s). 18-0047-AU-COI

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group