

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Long-Term Forecast Report on behalf of Ohio Power Company and Related Matters.)	Case No. 18-501-EL-FOR
)	
)	
In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into Renewable Energy Purchase Agreements for Inclusion in the Renewable Energy Rider.)	Case No. 18-1392-EL-RDR
)	
)	
In the Matter of the Application of Ohio Power Company to Amend its Tariffs.)	Case No. 18-1393-EL-ATA

**MOTION TO INTERVENE
BY
OHIO PARTNERS FOR AFFORDABLE ENERGY**

Ohio Partners for Affordable Energy (“OPAE”) moves to intervene in these proceedings considering the Long-Term Forecast Report and related matters of Ohio Power Company (“Ohio Power”), seeking approval of Ohio Power’s proposal to enter into renewable energy purchase agreements for inclusion in its Renewable Generation Rider, and to amend its tariffs. The reasons why the Public Utilities Commission of Ohio (“Commission”) should grant OPAE’s motion to intervene in these proceedings are set forth in the attached Memorandum in Support.

Respectfully submitted,
/s/Colleen L. Mooney
Colleen L. Mooney
Reg. No. 0015668
Ohio Partners for Affordable Energy
P.O. Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@ohiopartners.org
(electronically subscribed)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Long-Term)
Forecast Report on behalf of) Case No. 18-501-EL-FOR
Ohio Power Company and)
Related Matters.)

In the Matter of the Application)
Seeking Approval of Ohio Power)
Company's Proposal to Enter into) Case No. 18-1392-EL-RDR
Renewable Energy Purchase)
Agreements for Inclusion in the)
Renewable Energy Rider.)

In the Matter of the Application of Ohio) Case No. 18-1393-EL-ATA
Power Company to Amend its Tariffs.)

**MEMORANDUM IN SUPPORT
OF MOTION TO INTERVENE**

Ohio Partners for Affordable Energy ("OPAE") should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and Ohio Administrative Code Rule 4901-1-11. The above-referenced matters concern Ohio Power Company's ("Ohio Power") Long-Term Forecast Report, its application seeking approval of its proposal to enter into renewable energy purchase agreements for inclusion in its Renewable Generation Rider, and its application to amend its tariffs.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person's interest; the extent to which that interest is represented by existing parties; the person's potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in these matters.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in these matters. Additionally, OPAE includes as members non-profit organizations that will be affected by these matters.¹ Many of OPAE's members are Community Action Agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, Community Action Agencies are charged with advocating for low-income residents of their communities.

OPAE's primary interest in these matters is to protect the interests of low and moderate income Ohioans and OPAE members whose provision of service will be affected by these matters. In addition to advocating for low and moderate income Ohioans, OPAE members serve a variety of roles in the provision of programs for low-income residential customers such as client intake, client counseling, consumer education services, emergency bill payment assistance, targeted energy efficiency services, and other functions related to program operations. Further, OPAE members are non-residential electric distribution customers of Ohio Power and will be subject to any charges approved in these cases. OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of these cases.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The matters will have an impact on the affordability of electric service for low-income households in Ohio Power's service area. The disposition of these matters may impair or impede the ability of OPAE to protect its interests. No other party to the matters will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate for low-income residential customers, a

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

service provider to low-income residential customers, and a non-profit, non-residential customer group. No other party represents this group of interests. OPAE's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these matters.

Therefore, OPAE is entitled to intervene in these matters with the full powers and rights granted by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

Respectfully submitted,

Colleen L. Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
cmooney@opae.org
(electronically subscribed)

CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served electronically by the Commission's Docketing Division on parties who are electronically subscribed to these cases on this 1st day of October 2018.

/s/Colleen L. Mooney
Colleen L. Mooney

SERVICE LIST

stnourse@aep.com
cblend@aep.com
egallon@porterwright.com
bhughes@porterwright.com
christopher.miller@icemiller.com
Jason.rafeld@icemiller.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
Jkylercohn@BKLawfirm.com
William.Wright@ohioattorneygeneral.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/1/2018 3:05:16 PM

in

Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy