

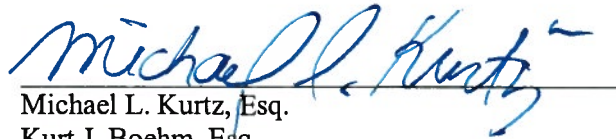
**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of The PowerForward Collaborative	:	Case No. 18-1595-EL-GRD
	:	
In the Matter of The PowerForward Distribution System Planning Working Group	:	Case No. 18-1596-EL-GRD
	:	
In the Matter of The PowerForward Data and Modern Grid Workgroup	:	Case No. 18-1597-EL-GRD
	:	

**MOTION TO INTERVENE 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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October 26, 2018

COUNSEL FOR THE OHIO ENERGY GROUP

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**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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Case No(s). 18-1595-EL-GRD, 18-1596-EL-GRD, 18-1597-EL-GRD

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