

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term Forecast Report 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 Generation 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 OF  
THE PJM POWER PROVIDERS GROUP  
AND  
THE ELECTRIC POWER SUPPLY ASSOCIATION**

Pursuant to Revised Code Section 4903.221 and the Ohio Administrative Code Rule 4901-1-11, the PJM Power Providers Group (“P3”) and the Electric Power Supply Association (“EPSA”) each move to intervene as a full party of record in the above proceedings, which have been consolidated. As associations representing independent power producers, P3 and EPSA share a common interest in these proceedings, regarding the stated need for at least 900 megawatts of Ohio renewable generation projects to be owned or operated by Ohio Power Company in order to satisfy its standard service offer obligation, and whether the proposal is permissible under Revised Code Section 4928.143(B)(2)(c). Moreover, P3 and EPSA’s joint participation and presentation will further the goal of judicial economy by reducing redundant briefs and testimony. The reasons supporting the interventions are contained in the accompanying Memorandum in Support.

Accordingly, P3 and EPSA respectfully request that the Commission grant their request to intervene and that P3 and EPSA each individually be made a full party of record.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

Gretchen L. Petrucci (0046608)

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

Columbus, Ohio 43215

Tel. (614) 464-5462

[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)

[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

Attorneys for the PJM Power Providers Group and  
the Electric Power Supply Association

**MEMORANDUM IN SUPPORT OF  
THE MOTION TO INTERVENE OF  
THE PJM POWER PROVIDERS GROUP  
AND  
THE ELECTRIC POWER SUPPLY ASSOCIATION**

The PJM Power Providers Group (“P3”) is a nonprofit trade association whose corporate members<sup>1</sup> are engaged in electric generation and sales in the PJM Regional Transmission Organization. P3<sup>2</sup> believes that properly designed and well-functioning competitive markets are the most effective means of ensuring a reliable supply of power to the PJM region, facilitating investments in energy generation of all types, and promoting prices that will allow consumers to enjoy the benefits of competitive electricity markets. Combined, P3 members own over 75,000 megawatts of power, own over 51,000 miles of transmission lines, serve nearly 12.2 million customers and employ over 55,000 people in the PJM region – encompassing 13 states and the District of Columbia.

The Electric Power Supply Association (“EPSA”) is a national trade association representing leading independent power producers and marketers.<sup>3</sup> Power supplied on a competitive basis collectively accounts for 40% of all the installed generation capacity in the United States. EPSA members include many of the premier generation companies utilizing innovative environmental and cost-effective generation technology. Many of EPSA’s members own or operate facilities in Ohio and are market participants in PJM Interconnection, L.L.C. (“PJM”). EPSA seeks to bring the benefits of competitive generation to all power customers. P3

---

<sup>1</sup> P3 is a nonprofit corporation dedicated to promoting policies that will allow the PJM region to fulfill the promise of its competitive wholesale electricity markets. For more information on P3, visit [www.p3powergroup.com](http://www.p3powergroup.com).

<sup>2</sup> The positions taken in this proceeding by P3 represent the position of P3 as an organization, but not necessarily the views of any particular member with respect to any issue.

<sup>3</sup> See the EPSA website at [www.epsa.org](http://www.epsa.org) for details on membership, mission statements and association activities. The views expressed in this pleading represent the position of EPSA and are not necessarily the views of any particular member with respect to any particular issue.

and EPSA, jointly referred to hereafter as “Wholesale Suppliers,” are trade associations whose members have direct pecuniary interests in the matters at bar.

Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, established the standard for intervention in these proceedings as a full party of record. Rule 4901-1-11 states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

\* \* \*

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.

To determine a direct interest, the factors that the Commission considers in implementing the above rule are the nature of the intervenor’s interest, the extent that interest is represented by existing parties, the intervenor’s potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. (*See also* Revised Code Section 4903.221(B)). A review of the intervention criteria in light of the following facts supports granting the Wholesale Suppliers’ intervention.

As part of its proposed long-term forecast in Case Nos. 18-501-EL-FOR, Ohio Power Company (“Ohio Power”) presents a stated need for at least 900 megawatts of Ohio renewable generation projects to be owned or operated by Ohio Power in order to satisfy its standard service offer obligation. Ohio Power also seeks to establish ratepayer-funding for the life of the generation projects by recovering the costs through the Renewable Generation Rider (RGR). In addition, Ohio Power proposes a new tariff offering under which distribution customers can purchase renewable energy credits and support development of these renewable projects by offsetting certain costs.

The Wholesale Suppliers' business interests in the state will be directly affected by the outcome of these proceedings. The Wholesale Suppliers' intervention and participation will enhance the proceeding as the Wholesale Suppliers will provide commercial knowledge of the wholesale market. The Wholesale Suppliers have a unique interest in this proceeding which cannot be represented by any existing parties. P3 and EPSA have substantial interests that meets the criteria of Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, and the Wholesale Suppliers' intervention will not delay the outcome because their intervention request is timely filed in accordance with the Attorney Examiner's schedule.

For purposes of receiving service in the proceeding, in addition to the undersigned, the Wholesale Suppliers request that the following individuals be placed on the official service list:

Sharon Theodore  
Electric Power Supply Association  
1401 New York Ave, NW, 9<sup>th</sup> Floor  
Washington, DC 20005  
[stheodore@epsa.org](mailto:stheodore@epsa.org)

Laura Chappelle  
201 N. Washington Square, Ste. 910  
Lansing, MI 48933  
[laurac@chappelleconsulting.net](mailto:laurac@chappelleconsulting.net)

Glen Thomas  
1060 First Avenue, Ste. 400  
King of Prussia, PA 19406  
[gthomas@gtpowergroup.com](mailto:gthomas@gtpowergroup.com)

WHEREFORE, P3 and EPSA respectfully request that the Commission grant this motion to intervene for both P3 and EPSA, and make each a full party of record.

Respectfully Submitted,

/s/ Gretchen L. Petrucci  
Michael J. Settineri (0073369), Counsel of Record  
Gretchen L. Petrucci (0046608)  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street  
Columbus, Ohio 43215  
Tel. (614) 464-5462  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

Attorneys for the PJM Power Providers Group and  
the Electric Power Supply Association

## 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 on the service list of the docket cards who have electronically subscribed to the cases. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 29th day of October 2018 upon the persons/entities listed below.

/s/ Gretchen L. Petrucci  
Gretchen L. Petrucci

[stnourse@aep.com](mailto:stnourse@aep.com)  
[cblend@aep.com](mailto:cblend@aep.com)  
[egallon@porterwright.com](mailto:egallon@porterwright.com)  
[christopher.miller@icemiller.com](mailto:christopher.miller@icemiller.com)  
[bhughes@porterwright.com](mailto:bhughes@porterwright.com)  
[jason.rafeld@icemiller.com](mailto:jason.rafeld@icemiller.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)  
[william.michael@occ.ohio.gov](mailto:william.michael@occ.ohio.gov)  
[maureen.willis@occ.ohio.gov](mailto:maureen.willis@occ.ohio.gov)  
[christopher.healey@occ.ohio.gov](mailto:christopher.healey@occ.ohio.gov)  
[bojko@carpenterlipps.com](mailto:bojko@carpenterlipps.com)  
[dressel@carpenterlipps.com](mailto:dressel@carpenterlipps.com)  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  
[callwein@opae.org](mailto:callwein@opae.org)  
[paul@carpenterlipps.com](mailto:paul@carpenterlipps.com)  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)  
[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[glover@whitt-sturtevant.com](mailto:glover@whitt-sturtevant.com)  
[dparram@bricker.com](mailto:dparram@bricker.com)

[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[jkylereohn@BKLawfirm.com](mailto:jkylereohn@BKLawfirm.com)  
[gthomas@gtpowergroup.com](mailto:gthomas@gtpowergroup.com)  
[laurac@chappelleconsulting.net](mailto:laurac@chappelleconsulting.net)  
[stheodore@epsa.org](mailto:stheodore@epsa.org)  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)  
[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)  
[joliker@igsenergy.com](mailto:joliker@igsenergy.com)  
[mnugent@igsenergy.com](mailto:mnugent@igsenergy.com)  
[rsahli@columbus.rr.com](mailto:rsahli@columbus.rr.com)  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)  
[thomas.mcnamee@ohioattorneygeneral.gov](mailto:thomas.mcnamee@ohioattorneygeneral.gov)  
[jstock@beneschlaw.com](mailto:jstock@beneschlaw.com)  
[ocollier@beneschlaw.com](mailto:ocollier@beneschlaw.com)  
[jrego@beneschlaw.com](mailto:jrego@beneschlaw.com)  
[mmontgomery@beneschlaw.com](mailto:mmontgomery@beneschlaw.com)  
[ktreadway@oneenergyllc.com](mailto:ktreadway@oneenergyllc.com)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**10/29/2018 5:02:42 PM**

**in**

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

Summary: Motion to Intervene electronically filed by Mrs. Gretchen L. Petrucci on behalf of PJM Power Providers Group and Electric Power Supply Association