

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward)
Data and Modern Grid Workgroup) Case No. 18-1597-EL-GRD

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF INDUSTRIAL ENERGY USERS-OHIO**

Frank P. Darr (Reg. No. 0025469)
(Counsel of Record)
Matthew R. Pritchard (Reg. No. 0088070)
MCNEES WALLACE & NURICK LLC
21 East State Street, 17TH Floor
Columbus, OH 43215
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
fdarr@mwncmh.com
(willing to accept service via e-mail)
mpritchard@mwncmh.com
(willing to accept service via e-mail)

OCTOBER 31, 2018

**ATTORNEYS FOR INDUSTRIAL ENERGY USERS-
OHIO**

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**MOTION TO INTERVENE OF
INDUSTRIAL ENERGY USERS-OHIO**

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On October 24, 2018, the Commission issued an Entry establishing a PowerForward Collaborative, as well as two workgroups, the Distribution System Planning Workgroup ("PWG") and the Data and Modern Grid Workgroup ("DWG"). This proceeding, the DWG, will address the creation of protocol for data privacy protections; drive toward real-time or near real-time data becoming available; and prescribe the methodology for competitive retail electric service ("CRES") providers and other third parties to obtain customer energy usage data. The issues addressed in this proceeding could ultimately affect the price, terms, and conditions upon which IEU-Ohio members receive retail electric service.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding and is so situated that the disposition

of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

Frank P. Darr (Reg. No. 0025469)

(Counsel of Record)

Matthew R. Pritchard (Reg. No. 0088070)

MCNEES WALLACE & NURICK LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

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fdarr@mwncmh.com

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Attorneys for Industrial Energy Users-Ohio

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDUs"). IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to SB 221, and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

Frank P. Darr (Reg. No. 0025469)

(Counsel of Record)

Matthew R. Pritchard (Reg. No. 0088070)

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(willing to accept service by e-mail)

mpritchard@mwncmh.com

(willing to accept service by e-mail)

Attorneys for Industrial Energy Users-Ohio

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the Commission'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 Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 31st day of October 2018, via electronic transmission.

/s/ Matthew R. Pritchard

Matthew R. Pritchard

Michael L. Kurtz

Kurt J. Boehm

Jody Kyler Cohn

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, OH 45202

mkurtzt@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

ATTORNEYS FOR OHIO ENERGY GROUP

William L. Wright (Reg. No. 0018010)

Chief, Public Utilities Section

Office of Attorney General

30 E. Broad St., 16th Floor

Columbus, OH 43215

william.wright@puc.state.oh.us

ATTORNEYS FOR THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO

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Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio
electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio