

**BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255

TELECOPIER (513) 421-2764

**Via E-FILE**

April 11, 2019

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

**In re: Case No. 19-0568-EL-ATA and 19-0572-EL-UNC**

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matter.

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 UTILITY COMMISSION OF OHIO**

In the Matter of The Application of The Dayton Power and Light Company to Establish a Tax Savings Credit Rider	:	Case No. 19-0568-EL-ATA
	:	
	:	
In the Matter of The Application of The Dayton Power and Light Company's Implementation of Certain Matters Relating to the Tax Cuts and Jobs Act of 2017	:	Case No. 19-0572-EL-UNC
	:	
	:	

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**MOTION FOR LEAVE TO INTERVENE  
OF THE OHIO ENERGY GROUP**

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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 Utility 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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Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

April 11, 2019

**COUNSEL FOR OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of The Application of The Dayton Power and Light Company to Establish a Tax Savings Credit Rider	:	Case No. 19-0568-EL-ATA
	:	
	:	
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	:	
	:	

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

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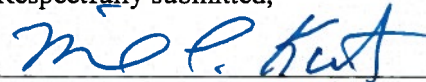
Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio should grant OEG leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Cargill, Incorporated, General Motors LLC and TimkenSteel Corporation. These companies purchase electric distribution services from Dayton Power and Light Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. 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,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

**COUNSEL FOR THE OHIO ENERGY GROUP**

April 11, 2019

## 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 on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 11<sup>th</sup> day of April, 2019 to the following:



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

DAYTON POWER AND LIGHT COMPANY

JUDI L. SOBECKI

1065 WOODMAN DR

DAYTON OH 45432

OHIO CONSUMERS' COUNSEL

CHRISTOPHER HEALY

65 EAST STATE STREET 7TH FLOOR

COLUMBUS OH 43215-4203

\*WILLIAMS, JAMIE MS.

OHIO CONSUMERS' COUNSEL

65 EAST STATE STREET, 7TH FLOOR

COLUMBUS OH 43215-4213

\*KELLIE, JESSICA E MRS.

DAYTON POWER AND LIGHT

1065 WOODMAN DRIVE

DAYTON OH 45432



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

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**Case No(s). 19-0568-EL-ATA, 19-0572-EL-UNC**

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