

**BEFORE  
THE OHIO POWER SITING BOARD**

IN THE MATTER OF THE APPLICATION OF )  
AMERICAN TRANSMISSION SYSTEMS, INC. )  
FOR A CERTIFICATE OF ENVIRONMENTAL )  
COMPATIBILITY AND PUBLIC NEED FOR )  
THE CONSTRUCTION OF THE WOOD )  
COUNTY 138-KV REINFORCEMENT )  
PROJECT. )

CASE NO. 18-1335-EL-BTX

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF  
AMERICAN MUNICIPAL POWER, INC.**

**American Municipal Power, Inc.**

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May 22, 2019

**BEFORE  
THE OHIO POWER SITING BOARD**

IN THE MATTER OF THE APPLICATION OF )	
AMERICAN TRANSMISSION SYSTEMS, INC. )	
FOR A CERTIFICATE OF ENVIRONMENTAL )	
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**MOTION TO INTERVENE OF  
AMERICAN MUNICIPAL POWER, INC.**

American Municipal Power, Inc. ("AMP") hereby respectfully moves the Ohio Power Siting Board ("Board"), pursuant to Sections 4903.221 and 4906.12, Revised Code, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C.") for leave to intervene in the above-captioned matter with the full powers and rights granted by the Board, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On December 19, 2018, American Transmission Systems, Incorporated ("ATSI") filed an application with the Board for a certificate of environmental compatibility and public need for proposed improvements to the transmission and subtransmission systems in Wood County, Ohio, including the construction of a new 5.5 mile long 138 kilovolt (kV) transmission line from the Lemoyne-Midway transmission line to the Brim substation. On April 11, 2019, the Board issued an Entry that requires interested parties to file petitions to intervene by May 23, 2019.

As demonstrated further in the Memorandum in Support, attached hereto and incorporated herein, AMP 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. AMP 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 this proceeding. The interests of AMP will not be adequately represented by other parties to the proceeding and, as such, AMP is entitled to intervene with the full powers and rights granted by the Board, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,

/s/ Lisa G. McAlister

American Municipal Power, Inc.

Lisa G. McAlister

Senior VP and General Counsel for  
Regulatory Affairs

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**MEMORANDUM IN SUPPORT**

In support of this Motion to Intervene, AMP states that it is a nonprofit Ohio corporation organized in 1971. AMP's members are political subdivisions of their respective domicile states that own and operate municipal electric utility facilities (including generating stations and distribution facilities). AMP's members are located within the PJM Interconnection, LLC ("PJM") and MidContinent ISO ("MISO") footprints but also outside of regional transmission organization ("RTO") or independent system operator ("ISO") footprints (specifically, in the LG&E/KU service area).

AMP is a full or partial requirements supplier for most of its 135 members. AMP's primary purpose is to assist its member communities in meeting their electric and energy needs. This purpose is served in a number of ways, including through the ownership of electric generation, the scheduling and dispatch of member-owned generation, and power supply and transmission arrangements that AMP makes with third parties at the request of and on behalf of its members.

Many of AMP's members are located in the ATSI transmission zone giving them a direct interest in the outcome of this proceeding. Additionally, AMP and ATSI have an Operating and Interconnection Agreement for Wholesale Load that has been approved

by the Federal Energy Regulatory Commission that governs the operations between ATSI and AMP as it pertains to AMP member delivery points that would be impacted by ATSI's proposed project. Accordingly, AMP and its members have direct and substantial interests in the outcome of this proceeding, the disposition of which may impair or impede AMP's ability to protect those interests. Those interests cannot be adequately represented by any other party, and, for these reasons, intervention by AMP and its members clearly is justified and consistent with the public interest. For these reasons, AMP hereby requests that the Board grant its intervention with the full powers and rights granted by the Board, specifically by statute and by the provisions of the O.A.C., to intervening parties.

For the reasons stated herein, AMP respectfully requests this Board grant its Motion to Intervene.

Respectfully submitted,

/s/ Lisa G. McAlister  
American Municipal Power, Inc.  
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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support of American Municipal Power, Inc. was served upon the following parties of record this 22nd day of May, 2019, via electronic transmission or first class mail, postage prepaid.

/s/ Lisa G. McAlister  
Lisa G. McAlister

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**Case No(s). 18-1335-EL-BTX**

Summary: Motion Motion to Intervene and Memorandum in Support of American Municipal Power, Inc. electronically filed by Barbara E Johnson on behalf of American Municipal Power, Inc.