

**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**

August 1, 2019

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

**In re: Case No. 19-1475-EL-RDR**

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP's (OEG) 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,

A handwritten signature in blue ink, appearing to read "Michael L. Kurtz", is written over the typed name.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew

Encl.

Cc: Certificate of Service

**BEFORE THE**  
**PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Initiate its gridSMART® Phase 3 Project	: : : :	19-1475-EL-RDR
--	------------------	----------------

---

**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,



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)

August 1, 2019

**COUNSEL FOR THE OHIO ENERGY GROUP**

**BEFORE THE**  
**PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Initiate its gridSMART® Phase 3 Project	: : : :	19-1475-EL-RDR
--	------------------	----------------

---

**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 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 Public Utilities Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Amsted Rail Company, Inc., ArcelorMittal USA LLC, Arconic, Ford Motor Company, GE Aviation, Greif, Inc., JSW Steel Ohio, Inc., Messer, LLC, POET Biorefining, Praxair Inc., TimkenSteel Corporation and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. 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,

A handwritten signature in blue ink, appearing to read "Michael L. Kurtz", is written over a horizontal line.

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)

August 1, 2019

**COUNSEL FOR THE OHIO ENERGY GROUP**

## 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 1<sup>st</sup> day of August, 2019 to the following:

  
\_\_\_\_\_  
Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.

\*NOURSE, STEVEN T MR.

AMERICAN ELECTRIC POWER SERVICE CORPORATION  
1 RIVERSIDE PLAZA, 29TH FLOOR  
COLUMBUS OH 43215

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

**Commission of Ohio Docketing Information System on**

**8/1/2019 2:01:19 PM**

**in**

**Case No(s). 19-1475-EL-RDR**

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