

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)
Company to Initiate its gridSMART Phase 3)Case No. 19-1475-EL-RDR
Project.)

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE
AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned case pursuant to R.C. §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

/s/ Colleen L. Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@opae.org

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power)
Company to Initiate its gridSMART Phase 3)Case No. 19-1745-EL-RDR
Project.)

MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this application pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules and Regulations contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced application made by Ohio Power Company is to initiate its gridSMART Phase 3 project.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in this matter.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low- and moderate-income Ohioans; as such, OPAE has a real and substantial interest in this application which seeks to initiate Ohio Power’s gridSMART Phase 3 project. Additionally, OPAE includes as members non-profit organizations located in Ohio Power Company’s service area.¹ Moreover, many of OPAE’s members are community action agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

known as the Economic Opportunity Act of 1964, community action is charged with advocating for low-income residents of their communities.

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income residential customers of Ohio Power Company. OPAE members are also non-residential ratepayers of Ohio Power Company. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this application. OPAE's primary interest in this case is to protect the interests of low- and moderate-income Ohioans and OPAE members whose provision of electric service will be affected by this application.

For the above reasons, OPAE has a direct, real and substantial interest in this matter. The disposition of this matter may impair or impede OPAE's ability to protect its interests. No other party to the matter will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate for low-income residential consumers, service provider and nonprofit customer group. No other party represents this group of interests. OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by this proceeding. Therefore, OPAE's intervention in this proceeding should be granted.

Respectfully submitted,

/s/ Colleen L. Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@opae.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support will be served by the Commission's Docketing Division on these parties on this 5th day of August 2019.

/s/ Colleen L. Mooney
Colleen L. Mooney

stnourse@aep.com
cblend@aep.com
mkurtz@BKLawfirm.com
jklyercohn@BKLawfirm.com
william.wright@ohioattorneygeneral.com

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy