

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 18-1875-EL-GRD
Approval of Its Plan to Modernize Its)	
Distribution Grid.)	
)	
In the Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 18-1876-EL-WVR
Approval of a Limited Waiver of Ohio)	
Adm. Code 4901:1-18-06(A)(2).)	
)	
In the Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 18-1877-EL-AAM
Approval of Certain Accounting Methods.)	

MOTION FOR INTERVENTION
OF ARMADA POWER, LLC

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221, Rule 4901-1-11 of the Ohio Administrative Code ("OAC"), Armada Power, LLC ("Armada") respectfully moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio ("Commission") should grant Armada's leave to intervene due to the fact that Armada has a real and substantial interest in these proceedings, and the Commission's disposition of these proceedings may impede Armada's ability to protect that interest.

The reasons supporting the requested intervention are contained in the accompanying memorandum in support. Armada respectfully requests that it be granted leave to intervene in these proceedings.

MEMORANDUM IN SUPPORT

Armada is a limited liability company organized under the laws of the State of Delaware, with its principal office at 230 West Street, Columbus, OH 43215. Armada is a transformative technology company that manufactures and incorporates smart technologies into a secure platform to optimize individual devices into a larger, aggregated, controlled, and cohesive responsive grid tool. Armada has been operating within PJM Interconnection's footprint for several years and plans to expand its footprint into the western and southeastern regions of the country. Armada recently started to participate in regulatory proceedings in jurisdictions across the country to protect and enhance its technology and the electric grid.

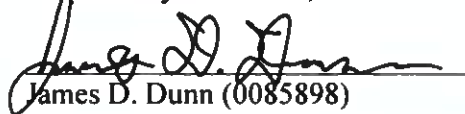
On December 21, 2018, The Dayton Power and Light Company ("the Company") filed an application for approval of a Distribution Modernization Plan ("DMP"). The application details the deployment of various technologies, including but not limited to, aggregation of smart technologies. Such technologies seek to enhance and optimize the electric grid that will benefit ratepayers and the environment. Under OAC Rule 4901-1-11 intervention may be permitted in a proceeding if that party has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may impair or impeded his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties. Furthermore, the Commission shall consider:

- 1) The nature and extent of the prospective intervenor's interest.
- 2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case.
- 3) Whether the intervention by the prospective intervenor will unduly prolong or delay proceedings.
- 4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.
- 5) The extent to which the person's interest is represented by existing parties.

Armada satisfies the intervention requirements above. First, Armada has a significant interest in the Company's pending application. Armada's technology and its customer base have the ability to enhance and stabilize the electric grid to the benefit of ratepayers and the environment. Second, Armada's technology within the marketplace falls within the considerations detailed in the DMP. The ongoing negotiations, discussions, and resolutions of issues raised within the proceedings will significantly and directly affect the economic interests and development of Armada's business. Third, Armada will not unduly prolong or delay the proceedings. Armada plans to be fully engaged and follow the procedural schedule accordingly. Fourth, Armada will significantly contribute to the full development and equitable resolution of the factual issues. As mentioned, Armada has transformative technology that will optimize individual devices into larger aggregated, controlled, and cohesive grid tool that will benefit the electric grid. To that end, Armada's unique and collaborative perspective of how technologies can positively affect the electric grid within the DMP will be valuable to the resolution of the proceedings. Lastly, no other party to this proceeding is positioned to protect Armada's interest or advance its position related to the Company's application and DMP. Armada's technology and business model is unique to the marketplace and will only be adequately protected and represented if it is granted intervention.

Due to the reasons set forth above, Armada Power, LLC respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,



James D. Dunn (0085898)

Dunn Legal, LLC (*Counsel for Armada Power*)

1790 Ivanhoe Court

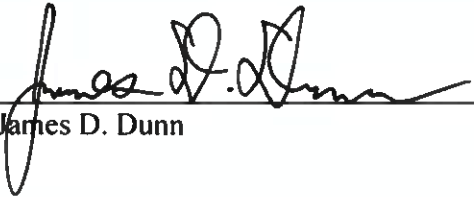
Columbus, OH 43220

Email: jdunnlegal@gmail.com

Telephone: (614)-545-8041

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 upon the following parties. In addition, I hereby certify that a service copy of the foregoing document was sent by or on behalf of the undersigned counsel to the following parties of record this 10th day of September 2019 via electronic transmission.


James D. Dunn

Michael.schuler@aes.com
dparram@bricker.com
Stephanie.chmiel@thompsonhine.com
Kevin.oles@thompsonhine.com
cmooney@opae.org
Robert.eubanks@ohioattorneygeneral.gov
Andrew.schaffer@ohioattorneygeneral.com
whitt@whitt-sturtevant.com
glover@whitt-sturtevant.com
nivjaykar@elpc.org
rdove@keglerbrown.com
jsharkey@ficlaw.com
djireland@ficlaw.com
chollon@ficlaw.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
barthroyer@aol.com
dborchers@bricker.com
khermstein@bricker.com
jspottswood@bricker.com
rsahli@columbus.rr.com
joe.halso@sierraclub.org
mleppla@theoec.org
tdougherty@theoec.org
mfleisher@dickinsonwright.com

mkurtz@blklawfirm.com
kboehm@blklawfirm.com
jkylercohn@blklawfirm.com
bojko@carpenterlipps.com
dressel@carpenterlipps.com
slesser@calfee.com
talexander@calfee.com
mkeaney@calfee.com
paul@carpenterlipps.com
dutton@carpenterlipps.com
terry.etter@occ.ohio.gov
angela.obrien@occ.ohio.gov
Bethany.allen@igsenergy.com
joliker@igsenergy.com
mnugent@igsenergy.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/10/2019 11:52:34 AM

in

Case No(s). 18-1875-EL-GRD, 18-1876-EL-WVR, 18-1877-EL-AAM

Summary: Motion Motion to Intervene of Armada Power, LLC electronically filed by Mr. James D Dunn on behalf of Armada Power, LLC