

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

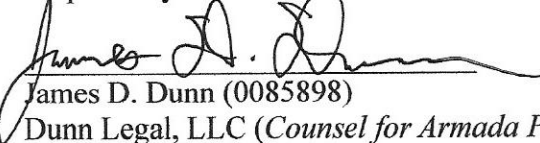
In the Matter of the Application of)	
Duke Energy Ohio, Inc. for Authority)	Case No. 19-1750-EL-UNC
to Adjust its Power Forward Rider.)	
)	
In the Matter of the Application of The)	
Duke Energy Ohio, Inc. for Approval to)	Case No. 19-1751-GE-AAM
Change Accounting Methods.)	

MOTION FOR LEAVE TO INTERVENE OF ARMADA POWER, LLC

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and 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 leave to intervene since 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 Power respectfully requests that it be granted leave to intervene in these proceedings.

Respectfully submitted,


James D. Dunn (0085898)
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Telephone: (614)-545-8041

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**MEMORANDUM IN SUPPORT OF ARMADA POWER'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to Ohio Rev. Code Section 4903.221 and Ohio Admin. Code Section 4901-01-11, the Commission should grant Armada leave to intervene in this proceeding.

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 electric 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.

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

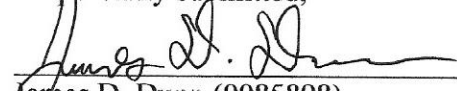
person's interest is adequately represented by existing parties. Furthermore, the Commission shall consider:

- 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. 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. Armada's technology within the marketplace falls within the considerations detailed in Duke's filing. 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. Armada will not unduly prolong or delay the proceedings. Armada plans to be fully engaged and follow the procedural schedule accordingly. 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. Armada's unique grid technology will provide a unique and collaborative perspective of how technologies can positively affect the grid within Duke's territory. Lastly, no other party to this proceeding is positioned to protect Armada's interest or advance its position related to the Duke's application. 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 for Leave to Intervene be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James D. Dunn", is written over a horizontal line.

James D. Dunn (0085898)

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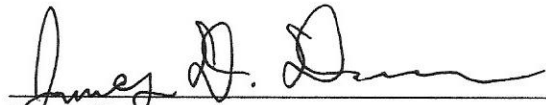
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CERTIFICATE OF SERVICE

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 23rd day of October

2019 via electronic transmission.


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in

Case No(s). 19-1750-EL-UNC, 19-1751-GE-AAM

Summary: Motion for Leave to Intervene and Memorandum in Support electronically filed by Mr. James Dunn on behalf of Armada Power, LLC