BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	))))	Case No. 20-650-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Approval of its Temporary Plan for Addressing the COVID-19 State of Emergency.	)))))	Case No. 20-651-EL-UNC
Dayton Power and Light Company for Waiver of Tariffs and Rules Related to the COVID-19 State of Emergency.	)))	Case No. 20-652-EL-WVR

MOTION OF INDUSTRIAL ENERGY USERS-OHIO FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT

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MARCH 26, 2020

COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

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MOTION OF INDUSTRIAL ENERGY USERS-OHIO FOR LEAVE TO INTERVENE

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On March 23, 2020, The Dayton Power and Light Company ("DP&L") filed an application related to an emergency plan addressing the COVID-19 emergency, and related requests for accounting authority, waivers, and emergency rate relief. Industrial Energy Users-Ohio ("IEU-Ohio") appreciates the efforts of the Commission and utilities to address these issues during these challenging times.

As demonstrated further in the Memorandum in Support, IEU-Ohio 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. IEU-Ohio 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 IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of Commission rules to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU").

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the State policy contained in R.C. 4928.02.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

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(Counsel of Record)
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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 *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 26th day of March 2020, *via* electronic transmission.

/s/ Matthew R. Pritchard
Matthew R. Pritchard

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Counsel for The Dayton Power and Light Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/26/2020 11:12:21 AM

in

Case No(s). 20-0650-EL-AAM, 20-0651-EL-UNC, 20-0652-EL-WVR

Summary: Motion Motion of Industrial Energy Users-Ohio for Leave to Intervene and Memorandum in Support electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio