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Via E-FILE

April 15, 2020

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

In re: Case Nos. 20-602-EL-UNC, 20-603-EL-WVR, 20-604-EL-AAM and 20-734-EL-AEC

Dear Sir/Madam:

Please find attached the MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP (OEG) e-filed today in the above-referenced matter(s).

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

/s/ Michael L. Kurtz

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 for Approval of its Temporary Plan for Addressing the COVID-19 State of Emergency	:	Case No. 20-602-EL-UNC
	:	
	:	
In the Matter of the Application of Ohio Power Company for Waiver of Tariffs and Rules Related to the COVID-19 State of Emergency	:	Case No. 20-603-EL-WVR
	:	
	:	
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority	:	Case No. 20-604-EL-AAM
	:	
	:	
In the Matter of the Application of Ohio Power Company for Approval of A Reasonable Arrangement	:	Case No. 20-734-EL-AEC
	:	
	:	

**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

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 Utility 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,

/s/ Michael L. Kurtz

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April 15, 2020

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company for Approval of its Temporary Plan for Addressing the COVID-19 State of Emergency	:	Case No. 20-602-EL-UNC
	:	
In the Matter of the Application of Ohio Power Company for Waiver of Tariffs and Rules Related to the COVID-19 State of Emergency	:	Case No. 20-603-EL-WVR
	:	
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority	:	Case No. 20-604-EL-AAM
	:	
In the Matter of the Application of Ohio Power Company for Approval of A Reasonable Arrangement	:	Case No. 20-734-EL-AEC
	:	

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio (“Commission”) should grant the Ohio Energy Group (“OEG”) leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio (“Commission”). OEG’s members who are participating in this intervention are: Air Products and Chemicals, Inc., AK Steel Corporation, ArcelorMittal USA LLC, BP Husky Refining, LLC, Cargill, Incorporated, Charter Steel, Elyria Foundry, Fiat Chrysler Automobile US LLC, Ford Motor Company, General Motors LLC, Greif, Inc., Howmet Aerospace Inc., Johns Manville, Messer, LLC, Martin Marietta Magnesia Specialties, LLC, Materion Brush Inc., Nature Fresh Farms USA LLC, North Star BlueScope Steel, LLC, POET Biorefining, Praxair Inc., PTC Alliance Holding Corporation, TimkenSteel Corporation and Worthington Industries. These companies purchase electric distribution services from First Energy. Therefore, the interests of OEG’s members may be directly affected by the outcome of this

proceeding. 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,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

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COUNSEL FOR THE OHIO ENERGY GROUP

April 15, 2020

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 15th day of April, 2020 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/15/2020 4:12:28 PM

in

Case No(s). 20-0603-EL-WVR, 20-0604-EL-AAM, 20-0734-EL-AEC

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