

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Approval of its)	Case No. 20-0602-EL-UNC
Temporary Plan for Addressing the COVID-)	
19 State of Emergency.)	
)	
In the Matter of the Application of Ohio)	
Power Company for Waiver of Tariffs and)	Case No. 20-0603-EL-WVR
Rules Related to the COVID-19 State of)	
Emergency.)	
)	
In the Matter of the Application of Ohio)	
Power Company for Approval of Certain)	Case No. 20-0604-EL-AAM
Accounting Authority.)	
)	
In the Matter of the Application of Ohio)	
Power Company for Approval of A)	Case No. 20-734-EL-AEC
Reasonable Arrangement.)	

**MOTION TO INTERVENE AND COMMENTS
OF
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11 and 4901:1-38-03(E), the Ohio Manufacturers' Association Energy Group (OMAEG) moves to intervene in the above-captioned proceeding before the Public Utilities Commission of Ohio (Commission). On March 17, 2020, Ohio Power Company's (AEP Ohio or the Company) filed a COVI-19 Plan¹ in response to the Commission's Entry directing public utilities to review policies and Ohio Administrative Code requirements that would impose a "service continuity hardship on residential and non-residential

¹ Application (March 17, 2020).

customers” during the COVID-19 emergency.² In its Application, AEP Ohio requested accounting authority to implement a rate mechanism to track, defer, and recover uncollectible costs that exceed the current pre-emergency level and to track and defer incremental operational costs associated with the COVID-19 Plan.³ AEP Ohio amended its COVID-19 Plan on March 24, 2020 and April 9, 2020, and requested approval of a reasonable arrangement under R.C. 4905.31 to allow minimum demand charges for commercial and industrial customers to be temporarily reset at lower usage levels.⁴ On April 17, 2020, the Commission directed stakeholders to file motions to intervene and comments by April 27, 2020, to assist the Commission in its review of AEP Ohio’s Second Amended Application.⁵

As demonstrated in the attached Memorandum in Support, OMAEG has a real and substantial interest in the proceeding which may be adversely affected by the outcome and which cannot be adequately represented by any other party. Further, OMAEG participation will not unduly delay the proceedings or prejudice any other party. Accordingly, OMAEG satisfies the standard for intervention set forth in Ohio statutes and regulations. OMAEG respectfully requests that this Commission grant its motion to intervene for these reasons and those set forth in more detail in the attached Memorandum in Support.

² *In the Matter of the Proper Procedures and Process for the Commission’s Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry at ¶ 7 (March 12, 2020) (COVID-19 Proceeding).

³ Application at 8.

⁴ See Amended Application (March 24, 2020); Second Amended Application (April 9, 2020).

⁵ *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 Nos. 20-0602-EL-UNC, et al., Entry at ¶ 13 (April 17, 2020).

In addition, as directed by the Commission's April 17, 2020 Entry and for the Commission's consideration, OMAEG hereby submits its comments to the Second Amended Application of AEP Ohio.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT
AND COMMENTS**

I. INTRODUCTION

On March 17, 2020, AEP Ohio filed a COVID-19 Plan⁶ in response to the Commission's Entry directing utilities to review policies and Ohio Administrative Code requirements that would impose a "service continuity hardship on residential and non-residential customers" during the COVID-19 emergency.⁷ In its Application, AEP Ohio requested accounting authority to

⁶ Application (March 17, 2020).

⁷ *In the Matter of the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry at ¶ 7 (March 12, 2020) (State of Emergency Proceeding).

implement a rate mechanism to track, defer, and recover uncollectible costs that exceed the current pre-emergency level and to track and defer incremental operational costs associated with its COVID-19 Plan.⁸ On March 24, 2020, AEP Ohio filed an Amended Application to update its COVID-19 Plan.⁹ On April 9, 2020, AEP Ohio filed a Second Amended Application requesting approval of its amended COVID-19 Plan and an economic development reasonable arrangement under R.C. 4905.31 to allow minimum demand charges for commercial and industrial customers to be temporarily reset at lower usage levels.¹⁰ The Commission Staff filed its review and recommendation on April 15, 2020.¹¹

On April 17, 2020, the Commission directed stakeholders to file motions to intervene and comments by April 27, 2020, to assist the Commission in its review of AEP Ohio's Second Amended Application.¹² Accordingly, OMAEG hereby files its motion to intervene and comments to AEP Ohio's amended COVID-19 Plan and AEP Ohio's deferral and cost recovery proposals.

⁸ Application at 8.

⁹ See Amended Application (March 24, 2020).

¹⁰ See Second Amended Application (April 9, 2020).

¹¹ See Staff Recommendation at 3 (Staff Report) (April 15, 2020) (Please note that the Staff Report does not include page numbers. Thus, for purposes of this filing, we have manually numbered the page numbers, beginning with the page containing case numbers and the title "Summary." The cover page filed with the Staff Report is excluded from the numbering.)

¹² *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 Nos. 20-0602-EL-UNC, et al., Entry at ¶ 13 (April 17, 2020).

II. INTERVENTION

R.C. 4903.221 and Ohio Adm. Code 4901-1-11 and 4901:1-38-03(E) establish the standards for intervention in Commission proceedings. R.C. 4903.221 provides, in pertinent part, that any person “who may be adversely affected” by a Commission proceeding is entitled to seek intervention in that proceeding. R.C. 4903.221(B) further requires the Commission to consider the nature and extent of the prospective intervenor’s interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor’s potential contribution to a just and expeditious resolution of the issues involved. Ohio Adm. Code 4901-1-11 and 4901:1-38-03(E) permit intervention to an affected party who demonstrates a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede its ability to protect that interest and whose interest is not adequately represented by an existing party.

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work directly with elected officials, regulatory agencies, the judiciary, and the media to provide education and information to energy consumers, regulatory boards and suppliers of energy; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. The OMAEG is a non-profit entity created by the Ohio Manufacturers’ Association (OMA) for these purposes. The OMAEG’s members are all members of the OMA.

OMAEG members purchase electric services from AEP Ohio and are subject to the Economic Development Rider (EDR) and other cost recovery mechanisms of AEP Ohio. OMAEG

has been a participant in other cases before the Commission involving rates charged by AEP Ohio and costs recovered from customers.¹³

OMAEG also has been a participant in other cases involving reasonable arrangements,¹⁴ and has an interest in ensuring that any benefits accruing to AEP Ohio or other customers through a reasonable arrangement, and the resultant discounted rates that are wholly funded by other customers, are just and reasonable.¹⁵ OMAEG also has an interest in ensuring that all arrangements approved by the Commission further the policy of the State of Ohio prescribed by R.C. 4928.02.¹⁶ Additionally, OMAEG has an interest in ensuring that no unreasonable or anticompetitive effects arise from reasonable arrangements.

OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMAEG is regularly and actively involved in Commission

¹³ See, e.g., *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case Nos. 16-1852-EL-SSO, et al., Opinion and Order (April 25, 2018) and *In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider*, et al., Case Nos. 14-1693-EL-RDR, et al. Opinion and Order (March 31, 2016). Also see *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates*, et al., Case Nos. 11-351-ELAIR, et al., Entry (November 1, 2011).

¹⁴ See, e.g., *In the Matter of the Application for Establishment of a Reasonable Arrangement Between Presrite Corporation and The Cleveland Electric Illuminating Company*, Case No. 17-1981-EL-AEC, Entry at 1 (granting OMAEG's Motion to Intervene); *In the Matter of the Joint Application of Vadata, Inc. and Ohio Power Company for Approval of a Unique Economic Development Arrangement for Ohio Data Center Campuses*, Case No. 17-1827-EL-AEC, Motion to Intervene and Comments of the Ohio Manufacturers' Association Energy Group (September 21, 2017); *In the Matter of the Application of Globe Metallurgical, Inc. for Approval of a Unique Arrangement Between Ohio Power Company and Globe Metallurgical, Inc.*, Case No. 16-737-EL-AEC, Entry at 1 (August 4, 2016) (granting OMAEG's Motion to Intervene).

¹⁵ Ohio Adm. Code 4901:1-38-03(A)(3) ("An electric utility and/or mercantile customer or group of mercantile customers filing an application for commission approval of an economic development arrangement bears the burden of proof that the proposed arrangement is reasonable and does not violate the provisions of sections 4905.33 and 4905.35 of the Revised Code, and shall submit to the commission verifiable information detailing the rationale for the arrangement."); R.C. 4905.35 ("No public utility shall give any undue or unreasonable preference or advantage to any . . . firm . . . or subject any . . . firm to any undue or unreasonable prejudice or disadvantage.").

¹⁶ Ohio Adm. Code 4901:1-38-03(B)(1).

proceedings and, as in previous proceedings, OMAEG's unique knowledge and perspective will contribute to the full development and equitable resolution of the issues in this proceeding. OMAEG's interest will not be adequately represented by other parties to the proceeding and its timely intervention will not unduly delay or prolong the proceeding.

Accordingly, OMAEG satisfies the criteria for intervention set out in R.C. 4903.221 and Ohio Adm. Code 4901-1-11 and 4901:1-38-03(E). OMAEG, therefore, respectfully requests that the Commission grant this motion, allow OMAEG to intervene with the full powers and rights granted by the Commission to intervening parties, and make OMAEG a full party of record.

III. COMMENTS.

A. OMAEG Applauds the Commission for its Actions During the State of Emergency.

OMAEG applauds the Commission for its swift action in directing the utilities to consider the impact of COVID-19 on Ohio's residential, commercial, and industrial customers.¹⁷ OMAEG also thanks AEP Ohio and other utilities for responding with proposals to assist businesses during this difficult time.¹⁸ Without such prudence, the public health and economic impact on Ohioans likely would be more severe during this challenging time.

In response to the COVID-19 emergency, OMA has become a repository of information for manufacturers seeking to protect employees from the virus.¹⁹ In addition, OMA has united with the Ohio Hospital Association, Ohio Manufacturing Extension Program, nursing homes, and

¹⁷ Emergency Proceeding, Entry at ¶ 7.

¹⁸ See Second Amended Application at 2.

¹⁹ See OMA's COVID-19 Resource Page, <https://www.ohiomfg.com/covid-19-resources/> (last accessed April 27, 2020).

Jobs Ohio to combat COVID-19 as the Ohio Manufacturing Alliance.²⁰ As a key member of the alliance, OMA is responsible for reaching out to manufacturing companies to promote the repurposing of operations to produce in-demand products, particularly products related to healthcare to protect Ohioans. Since early April, the Alliance has worked with OMA's members to manufacture critical and essential products. Governor Mike DeWine recently stated, "the Ohio Manufacturing Alliance is playing a critical role in helping our manufacturing companies connect with the resources needed to keep Ohioans safe as we fight COVID-19."²¹ Going forward, the Alliance will continue to play a critical role in Ohio's fight against COVID-19.

OMAEG agrees with Staff that actions need to be taken to suspend disconnections and remove financial barriers to reconnection or continuity of service and to expand customer assistance programs.²² But OMAEG has concerns about the financial pressure being exerted on customers and the potential for utility rate increases during this time and after the emergency. Many manufacturers have also incurred unique expenses and foregone revenue during the declared emergency without a guarantee that those expenses and foregone revenue will be able to be recovered from their customers during or after the emergency. Therefore, any proposals that will cause manufacturers to incur increased costs during and after the declared emergency should be scrutinized, including proposals to defer for subsequent recovery incremental operating costs incurred and foregone revenue that result from implementing AEP Ohio's COVID-19 Plan.²³

²⁰ *Ohio Manufacturing Alliance Helps Company Repurpose to Produce COVID-19 Testing Swabs*, <https://repurposingproject.com/pdfs/04-24-2020-alliance-press-release.pdf> (April 24, 2020).

²¹ Id.

²² See Staff Report at 1-2, 3, 5-6.

²³ State of Emergency Proceeding, Entry at ¶ 13 (March 20, 2020).

B. AEP Ohio's Proposed Reasonable Arrangement Application Lacks Sufficient Information.

In its Second Amended Application, AEP Ohio seeks approval of a reasonable arrangement under R.C. 4905.31 to temporarily eliminate or offset through a bill credit the minimum billing demand charges for distribution services in order to assist customers in avoiding demand ratchet wires charges as a consequence of operational curtailments during the declared emergency.²⁴ Specifically, AEP Ohio is seeking approval of an economic development arrangement.²⁵ OMAEG agrees with AEP Ohio's assertion that all businesses are being impacted by the declared emergency and related economic crisis and that many would benefit from AEP Ohio's proposal to allow minimum demand charges to be temporarily reset at lower usage levels.²⁶

But OMAEG does not agree with AEP Ohio's claim that "there are no potential negative impacts of the proposed program"²⁷ as AEP Ohio's proposed program does not just eliminate antiquated demand ratchets to assist struggling manufacturers during the declared emergency. Rather, it also includes a request to defer and recover foregone revenues associated with the program through the EDR. OMAEG does and would support AEP Ohio's proposal to forego revenues associated with antiquated demand ratchets during the stated emergency. OMAEG, however, questions the prudence and reasonableness of AEP Ohio's proposal to collect such foregone revenue through the EDR. As Staff explained, AEP Ohio's proposal to recover foregone revenues resulting from the COVID-19 emergency is "not a typical reasonable arrangement" under R.C. 4905.31.²⁸ Allowing AEP Ohio to use a reasonable arrangement and associated rider under

²⁴ Second Amended Application at 5.

²⁵ Id. at 6, 7.

²⁶ Id. at 6.

²⁷ Id.

²⁸ Staff Report at 5.

R.C. 4905.31 to collect foregone revenue associated with the COVID-19 emergency would create bad precedent and public policy and could open the statute and Commission's rules up for abuse. The foregone revenues associated with COVID-19 that AEP Ohio seeks to recover were not the type of revenues intended to be recovered under the economic development arrangement in Ohio Adm. Code 4901:1-38-03 or any other reasonable arrangement under Chapter 4901:1-38.²⁹

As Staff recognized, given that AEP Ohio's proposal is not a typical reasonable arrangement, there may be other recovery options that are more appropriate, including a repayment of the benefit received by customers who were provided relief.³⁰ There may also be other government assistance specifically related to COVID-19 that may not require other customers to face more or increased costs during the COVID-19 emergency or during the recovery phase of the emergency.

In its application for an economic development reasonable arrangement, AEP Ohio has not projected or estimated the level of foregone revenues associated with the minimum billing demand provisions that it anticipates deferring for future recovery. Additionally, as Staff explained, AEP Ohio has requested deferral authority for future recovery of other categories of foregone revenue that are unknown.³¹

Ohio Adm. Code 4901:1-38-03 requires that an application for approval of an economic development arrangement include specific information about the proposed arrangement and provide information on all associated incentives, estimated billings without incentives, and annual

²⁹ See Ohio Adm. Code 4901:1-38-02(A) ("The purpose of this chapter is to facilitate the state's effectiveness in the global economy, to promote job growth and retention in the state, to ensure the availability of reasonably priced electric service, to promote energy efficiency and to provide a means of giving appropriate incentives to technologies that can adapt successfully to environmental mandates in furtherance of the policy of the state of Ohio embodied in section 4928.02 of the Revised Code.").

³⁰ Staff Report at 5

³¹ Id.

estimated delta revenues for the term of the incentives. Ohio Adm. Code 4901:1-38-03 states, in pertinent part:

(B) An electric utility, mercantile customer, or group of mercantile customers of an electric utility may file an application for an economic development arrangement between the electric utility and its customer or group of customers for the retention of an existing customer(s) likely to cease, reduce, or relocate its operations out of state. The application shall include a copy of the proposed arrangement and provide information on all associated incentives, estimated annual electric billings without incentives for the term of the incentives, and annual estimated delta revenues for the term of the incentives.

(1) Each customer requesting to take service pursuant to an economic development arrangement with the electric utility shall describe the general status of the customer in the community and how such arrangement furthers the policy of the state of Ohio embodied in section 4928.02 of the Revised Code.

(2) Each customer requesting to take service pursuant to an economic development arrangement with the electric utility shall, at a minimum, meet the following criteria, submit to the electric utility verifiable information detailing how the criteria are met, and provide an affidavit from a company official as to the veracity of the information provided:

(a) Eligible projects shall be for non-retail purposes.

(b) The number of full-time or full-time equivalent jobs to be retained shall be at least twenty-five.

(c) The average billing load (in kilowatts to be retained) shall be at least two hundred fifty kilowatts.

(d) The customer shall demonstrate that the cost of electricity is a major factor in its decision to cease, reduce, or relocate its operations to an out-of-state site. In-state relocations are not eligible. If the customer has the potential to relocate to an out-of-state site, the site(s) shall be identified, along with the expected costs of electricity at the site(s) and the expected costs of other significant expenses including, but not limited to, labor and taxes.

(e) The customer shall identify any other local, state, or federal assistance sought and/or received in order to maintain its current operations.

(f) The customer shall agree to maintain its current operations for the term of the incentives.

AEP Ohio has failed to provide the requisite information in its Second Amended Application, seeking approval for an economic development arrangement. AEP Ohio's application is insufficient and additional information is necessary to determine the reasonableness of AEP Ohio's proposal prior to Commission approval.

Finally, the Commission should consider whether the economic development arrangement is just and reasonable,³² furthers the policy of the state of Ohio prescribed by R.C. 4928.02,³³ and whether any unreasonable or anticompetitive effects arise from the arrangement. A Commission-approved arrangement should balance any purported benefits to individual customers with the costs required to achieve such benefits. The cost-benefit analysis should consider the amount and level of the foregone revenue that will be paid for by other customers and the impact on all customers' bills during the COVID-19 emergency and during the subsequent recovery period. The Commission should ensure there is proper alignment between benefits received under the economic development arrangement by customers and the cost of AEP Ohio's proposed program to other customers.

C. The Uncertainty of the Deferral Amounts and the Potential for Double Recovery Are Problematic.

OMAEG shares Staff's concerns regarding the uncertainty of the deferral amounts and the potential for double recovery.³⁴ The level and type of costs for which AEP Ohio is seeking deferral authority, and how those costs will be allocated and recovered from customers in the future is unknown and uncertain. The uncertainty associated with the level of foregone revenues that AEP Ohio proposes to recover from customers in the future is concerning as many customers will be

³² Ohio Adm. Code 4901:1-38-03(A)(3).

³³ Ohio Adm. Code 4901:1-38-03(B)(1).

³⁴ Staff Report at 3-6.

struggling to recover for several months or possibly years from the economic crisis that occurred as a result of COVID-19. OMAEG has significant concerns about the implications of AEP Ohio's deferral requests on customers' rates in the future.

Staff also expressed concerns in its Staff Report regarding the potential for double-recovery of costs as "some expenses incurred in implementing the plan may represent costs currently collected in rates, and thus not incremental to rates."³⁵ Staff explained that it is unclear what expenses have been incurred as part of the COVID-19 Plan that are above and beyond what is already included in base rates.³⁶ Staff explained the importance of ensuring that double-recovery does not occur as a result of the deferral.³⁷ OMAEG agrees that it is important to protect customers from paying twice for the same costs.

The concern about double recovery is particularly pertinent given that AEP Ohio's COVID-19 Plan is in its beginning stages and the level and type of costs that AEP Ohio is seeking authority to defer for future recovery from customers are yet to be determined. Accordingly, if the Commission approves deferral authority, the Commission should ensure that AEP Ohio does not receive double recovery from customers for costs already included in base rates and that any costs recovered from customers are just, reasonable, and were prudently incurred. To that end, OMAEG recommends that the Commission adopt Staff's recommendation regarding the recovery of the deferred amounts and note that recovery is not guaranteed as only those deferred amounts that are prudent, properly computed, properly recorded, reasonable, and not already recovered in rates will be eligible for subsequent recovery.³⁸

³⁵ Id. at 4.

³⁶ Id.

³⁷ Id.

³⁸ Staff Report at 6.

IV. CONCLUSION.

In summary, OMAEG satisfies the standards set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11 and 4901:1-38-03(E), and is authorized to intervene with the full powers and rights that the Commission grants to intervening parties. Accordingly, OMAEG respectfully requests that the Commission grant its motion to intervene, allow OMAEG to intervene with the full powers and rights granted by the Commission to intervening parties, and make OMAEG a full party of record. OMAEG further requests that the Commission give due consideration to the comments articulated herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on April 27, 2020 upon the parties listed below.

/s/ Kimberly W. Bojko

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Summary: Motion Motion to Intervene and Comments of The OMAEG electronically filed by Ms. Cheryl A Smith on behalf of The Ohio Manufacturers' Association Energy Group