

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton) Power and Light Company for an Increase In) Its Electric Distribution Rates.)	Case No. 20-1651-EL-AIR
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In the Matter of the Application of The Dayton) Power and Light Company for Accounting) Authority.)	Case No. 20-1652-EL-AAM
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In the Matter of the Application of The Dayton) Power and Light Company for Approval) Of Revised Tariffs.)	Case No. 20-1653-EL-ATA
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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
TO INTERVENE AND MEMORANDUM IN SUPPORT**

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DECEMBER 30, 2020

COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
TO INTERVENE**

Industrial Energy Users-Ohio ("IEU-Ohio") respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221 and Ohio Adm.Code 4901-1-11, 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 Ohio Administrative Code, to intervening parties.

On November 30, 2020, The Dayton Power and Light Company ("DP&L"), filed an Application for an Increase in Electric Distribution Rates, Application for Accounting Authority, and Application for Approval of Revised Tariffs. DP&L proposed a date certain of June 30, 2020, and a test period of the twelve-month period ending May 31, 2021.¹

¹ Motion to Establish a Test Period and Date Certain (Oct. 30, 2020) at ¶4.

Thereafter, on November 18, 2020, the Commission granted DP&L's Motion and adopted the proposed date certain and test period.²

IEU-Ohio's members include customers of DP&L and the resolution of these matters may directly affect rates paid by IEU-Ohio members. 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 proceedings and is so situated that the disposition of these proceedings 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 these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues. The interests of IEU-Ohio will not be adequately represented by other parties to the proceedings 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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² Entry (Nov. 18, 2020) at ¶1.

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Authority.)	

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Power and Light Company for Approval)	Case No. 20-1653-EL-ATA
Of Revised Tariffs.)	

MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers.³ IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU"), including from DP&L.

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.

³ 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 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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CERTIFICATE OF SERVICE

In accordance with Ohio Adm.Code 4901-1-05, 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 30th day of December, 2020, *via* electronic transmission.

/s/ Matthew R. Pritchard

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Case No(s). 20-1651-EL-AIR, 20-1652-EL-AAM, 20-1653-EL-ATA

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