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**Via E-FILE**

January 5, 2021

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

**In re: Case Nos. 18-1004-EL-RDR and 18-1759-EL-RDR**

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**

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IN THE MATTER OF THE REVIEW OF THE	:	Case No. 18-1004-EL-RDR
POWER PURCHASE AGREEMENT RIDER OF	:	
OHIO POWER COMPANY FOR 2018	:	
	:	
	:	
IN THE MATTER OF THE REVIEW OF THE	:	Case No. 18-1759-EL-RDR
POWER PURCHASE AGREEMENT RIDER OF	:	
OHIO POWER COMPANY FOR 2019	:	
	:	
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**MOTION TO INTERVENE OF THE  
THE OHIO ENERGY GROUP**

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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 Utilities 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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Jody Kyler Cohn, Esq.  
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January 5, 2021

**COUNSEL FOR THE OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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IN THE MATTER OF THE REVIEW OF THE	:	Case No. 18-1004-EL-RDR
POWER PURCHASE AGREEMENT RIDER OF	:	
OHIO POWER COMPANY FOR 2018	:	
	:	
	:	
IN THE MATTER OF THE REVIEW OF THE	:	Case No. 18-1759-EL-RDR
POWER PURCHASE AGREEMENT RIDER OF	:	
OHIO POWER COMPANY FOR 2019	:	
	:	
	:	
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**MEMORANDUM IN SUPPORT OF  
THE OHIO ENERGY GROUP'S  
MOTION TO INTERVENE**

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Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utilities Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Amsted Rail Company, Inc., ArcelorMittal USA LLC, Ford Motor Company, GE Aviation, Greif, Inc., Howmet Aerospace Inc. (formerly Arconic), Linde Inc. (formerly Praxair), Messer, LLC, POET Biorefining, TimkenSteel Corporation and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. 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.

Jody Kyler Cohn, Esq.

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January 5, 2021

**COUNSEL FOR THE OHIO ENERGY GROUP**

## 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 5th day of January, 2021 to the following:

/s/ Michael L. Kurtz

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Jody Kyler Cohn, Esq.

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**Case No(s). 18-1004-EL-RDR, 18-1759-EL-RDR**

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