

BOEHM, KURTZ & LOWRY
ATTORNEYS AT LAW
36 EAST SEVENTH STREET, SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

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**

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

**MOTION TO INTERVENE OF THE
THE OHIO ENERGY GROUP**

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

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: (513) 421-2255 Fax: (513) 421-2764
E-Mail: mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

January 5, 2021

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

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.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

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

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

*BINGHAM, DEB J. MS.
OFFICE OF THE OHIO CONSUMERS' COUNSEL
65 EAST STATE STREET, 7TH FLOOR
COLUMBUS OH43215-4203

NAEDER, KIMBERLY M
AGO
30 E. BROAD STREET
COLUMBUS OH43215

FINNIGAN, JOHN
65 E. STATE ST., 7TH FLOOR
COLUMBUS OH43215

*GREENE, TRACY J MRS.
OHIO CONSUMERS' COUNSEL
65 EAST STATE ST. 7TH FLOOR
COLUMBUS OH43215

*STAFF, DOCKETING
DOCKETING
180 EAST BROAD STREET 11TH FLOOR
COLUMBUS OH43215

*PRITCHARD, MATTHEW R. MR.
MCNEES WALLACE & NURICK
COLUMBUS OH43215

*NOURSE, STEVEN T MR.
AMERICAN ELECTRIC POWER SERVICE
CORPORATION
1 RIVERSIDE PLAZA, 29TH FLOOR
COLUMBUS OH43215

*KING, KELLI C.
PUCO
180 E. BROAD ST.
COLUMBUS OH43215

INDUSTRIAL ENERGY USERS-OHIO
MATTHEW R. PRITCHARD
MCNEES WALLACE & NURICK LLC
21 E STATE STREET, 17TH FLOOR
COLUMBUS OH 43215

OHIO CONSUMERS' COUNSEL
MICHAEL, WILLIAM
CHRISTOPHER HEALEY
65 EAST STATE STREET 7TH FLOOR
65 E STATE ST 7TH FL
COLUMBUS OH 43215-4203

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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