

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)
Dayton Power and Light Company to) Case No. 20-1651-EL-AIR
Increase its Rates for Electric Distribution.)

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 20-1652-EL-AAM
Accounting Authority.)

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 20-1653-EL-ATA
Approval of Revised Tariffs.)

**MOTION TO INTERVENE OF
ONE ENERGY ENTERPRISES LLC**

Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (OAC) Rule 4901-1-11, One Energy Enterprises LLC (“One Energy”) moves to intervene in the above-captioned proceedings. As set forth in more detail in the attached Memorandum in Support, One Energy requests that the Public Utilities Commission of Ohio (the “Commission”) grant One Energy’s motion because One Energy has a real and substantial interest in these proceedings, the Commission’s disposition of these proceedings may impair or impede One Energy’s ability to protect that interest, and One Energy’s participation will not cause undue delay.

Respectfully submitted on behalf of
ONE ENERGY ENTERPRISES, LLC



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MEMORANDUM IN SUPPORT

One Energy, based in Findlay, Ohio, has installed 40.5 megawatts (“MW”) of operating, behind-the-meter wind projects for industrial and manufacturing companies in Ohio. One Energy is responsible for developing more net metered wind projects in Ohio than all other entities combined. One Energy’s projects range from 1.5 MWs to 4.5 MW and serve a range of manufacturing and industrial facilities, including in DP&L’s service territory.

On November 30, 2020, the Dayton Power and Light Company (“DP&L”) filed an application to increase its electric distribution rates, which could ultimately affect One Energy and its net metering customers. To date, no procedural schedule has been set and there is not yet a deadline for interventions. Therefore, this motion to intervene is timely.

One Energy will be affected by the Commission’s determination in these matters and should be permitted to intervene because it has a real and substantial interest in these proceedings. One Energy continues to be involved in efforts at the Commission, and through its work with Ohio’s electric distribution utilities, to promote fair and non-discriminatory practices and policies for

behind-the-meter projects in Ohio, while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of the matters in these proceedings does not have a negative impact on industrial and manufacturing customers with behind-the-meter generation, or those installing behind-the-meter generation in Ohio, and spurs investment in distributed generation resources.

One Energy's substantial interest in these proceedings is not adequately addressed by any other party. One Energy's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to those who have installed or are installing behind-the-meter generation in Ohio.

Accordingly, One Energy respectfully requests the Commission determine that One Energy has a real and substantial interest in these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

Respectfully submitted on behalf of
ONE ENERGY ENTERPRISES, LLC



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CERTIFICATE OF SERVICE

In accordance with O.A.C. 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* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 1st day of April 2021.



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/1/2021 4:00:05 PM

in

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

Summary: Motion to Intervene of One Energy Enterprises LLC electronically filed by Teresa Orahoo on behalf of Matthew W. Warnock