

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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 No. 23-0023-EL-SSO

In the Matter of the Application of Ohio)
Power Company for Approval of Certain)
Accounting Authority.)

Case No. 23-0024-EL-AAM

MOTION TO INTERVENE OF ONE ENERGY ENTERPRISES INC.

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("O.A.C.") Rule 4901-1-11, One Energy Enterprises Inc. ("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 ("Commission") grant One Energy's motion because it 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 INC.

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**BEFORE
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In the Matter of the Application of Ohio)	
Power Company for Authority to Establish)	
a Standard Service Offer Pursuant to R.C.)	Case No. 23-0023-EL-SSO
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Security Plan.)	

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MEMORANDUM IN SUPPORT

One Energy helps large energy users build modern, tailored, on-site power facilities. In doing so, One Energy is decarbonizing, manufacturing, and enabling customer control. As a vertically integrated enterprise, One Energy provides physical solutions including Wind for Industry® and ManagedHV™, as well as analytics and commercial offerings to enable end users to fully customize their energy experience. Everyday items are being produced cleaner and more sustainably thanks to Wind for Industry® projects – from dishwashers, sliced turkey products, and soda cans, to cement and plastic products. Founded in 2009, One Energy is the largest installer and owner of behind-the-meter wind energy in the United States.

On January 6, 2023, Ohio Power Company (“AEP”) filed an application for approval of its fifth electric security plan (“ESP V”).¹

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

¹ See *In the Matter of the Application of Ohio Power Company for Approval of Its Electric Security Plan*, Application at 1 (January 6, 2023).

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. 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 INC.

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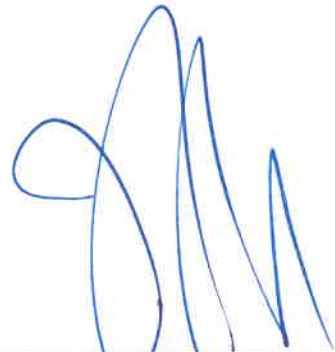
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CERTIFICATE OF SERVICE

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 Motion to Intervene was served upon the parties of record listed below this 16th day of February 2023 *via* electronic mail.

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Summary: Motion to Intervene of One Energy Enterprises Inc. electronically filed by
Mr. Marion H. Little on behalf of One Energy Enterprises Inc.