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September 3, 2008

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215

RE: Case Numbers: 08-920-EL-SSO
08-921-EL-AAM
08-922-EL-UNC
08-923-EL-ATA

Dear Docketing Division Clerk:

Enclosed for filing please find the original and five copies of the Motion to Intervene of The Village of Terrace Park. Please return file-stamped copies of this document to me in the enclosed self-addressed stamped envelope. Thank you

Very truly yours,

Robert P. Malloy

Robert P. Malloy

RPM:SLP
Enclosures
cc: All Counsel

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Technician *[Signature]* Date Processed *9-4-08*

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of an Electric Security Plan.	:	Case No. 08-920-EL-SSO
	:	
	:	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Amend Accounting Methods.	:	Case No. 08-921-EL-AAM
	:	
	:	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of a Certificate of Public Convenience and Necessity to Establish an Unavoidable Capacity Charge(s).	:	Case No. 08-922-EL-UNC
	:	
	:	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Amend its Tariff.	:	Case No. 08-923-EL-ATA

**MOTION TO INTERVENE
OF
THE VILLAGE OF TERRACE PARK**

The Village of Terrace Park ("Terrace Park" or "Village") hereby moves, pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, Terrace Park submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings with Terrace Park's participation may impair or impede its ability to protect that interest, and that its participation in these proceedings will contribute to a just result. Terrace Park further submits that no existing party represents its interest in these proceedings and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

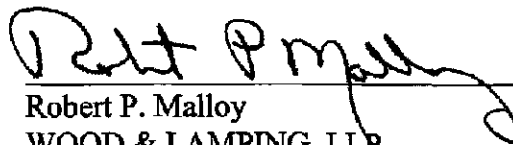
MEMORANDUM IN SUPPORT

Terrace Park relies upon Duke Energy Ohio ("DE-Ohio") to deliver the electric power necessary for various Village-owned and/or operated governmental facilities that exclusively rely upon DE-Ohio for generation services. These facilities include the Village Fire Department and Village Police Department. In addition, the vast majority of Village residents rely upon DE-Ohio for the provision of their electric services. The applications filed by DE-Ohio, if granted by the Commission, will significantly impact the price paid by the Village and its residents for electricity services.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, Terrace Park is a real party in interest herein, whose interest is not now represented, who can make a contribution to these proceedings and who will not unduly delay these proceedings or prejudice any existing party. Terrace Park submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns raised in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, the Village of Terrace Park respectfully requests that its motion to intervene in the above-captioned proceedings be granted.

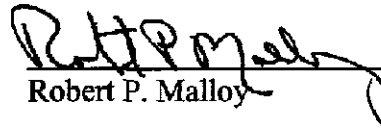
Respectfully submitted on behalf of
THE VILLAGE OF TERRACE PARK



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 3rd day of September 2008 via regular mail.


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