

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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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

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**JOINT MOTION TO INTERVENE  
OF  
THE AMERICAN WIND ENERGY ASSOCIATION, WIND ON THE WIRES AND  
OHIO ADVANCED ENERGY**

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The American Wind Energy Association ("AWEA"), Wind on the Wires ("WOW") and Ohio Advanced Energy ("OAE") jointly move, 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, AWEA, WOW and OAE submits that they have a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without the participation of AWEA, WOW and OAE may impair or impede their ability to protect that interest, and that their participation in these proceedings will contribute to a just result. AWEA, WOW and OAE further submit that no existing party represents their interest in these proceedings and that granting their motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

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## MEMORANDUM IN SUPPORT

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AWEA is a national trade association representing wind power project developers, equipment suppliers, services providers, parts manufacturers, utilities, researchers, and others involved in the wind industry. AWEA currently serves more than 1,500 members across the country. WOW serves as a key regional partner of the AWEA. WOW is comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry. WOW's simple mission is to provide wind energy with fair access to the electric transmission system delivering power to market.

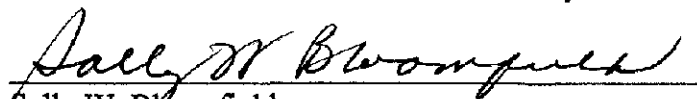
OAE is the premier Ohio-based business trade association advocating on behalf of advanced and renewable technology industries. Comprised of 22 companies and organizations working in the areas of solar power, wind power, and other advanced energy technologies, OAE advocated extensively in the General Assembly for the alternative energy portfolio standard in S.B. 221 and is implementing a coherent economic growth strategy for Ohio centered on advanced and renewable energy. The members of AWEA, WOW and OAE are potential suppliers of alternative energy sources to Ohio electric utilities, and as such they have a real and substantial interest in these applications as it pertains to the Applicant's proposals to secure alternative energy resources as well as an interest in other issues in these proceedings.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, AWEA, WOW and OAE are real parties in interest herein, whose interest are not now represented, who can make a contribution to these proceedings and who will not unduly delay these proceedings or prejudice any existing party. AWEA, WOW and OAE submit 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 American Wind Energy Association, Wind on the Wires and Ohio Advanced Energy respectfully request that their motion to intervene in the above-captioned proceedings be granted.

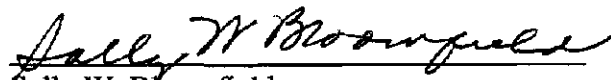
Respectfully submitted on behalf of  
AMERICAN WIND ENERGY ASSOCIATION  
WIND ON THE WIRES  
OHIO ADVANCED ENERGY



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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 4<sup>th</sup> day of September 2008 *via* regular mail.

  
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