

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio,)
Inc. for an Increase in Electric Distribution Rates.) Case No. 12-1682-EL-AIR

In the Matter of the Application of Duke Energy Ohio,)
Inc. for Tariff Approval.) Case No. 12-1683-EL-ATA

In the Matter of the Application of Duke Energy Ohio,)
Inc., for Approval to Change Accounting Methods.) Case No. 12-1684-EL-AAM

**MOTION TO INTERVENE
OF
CITY OF CINCINNATI**

The City of Cincinnati (“Cincinnati” or “City”) hereby moves, pursuant to Ohio Revised Code Section (“R.C.”) 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, Cincinnati submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without Cincinnati’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. Cincinnati 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.

Respectfully submitted on behalf of
CITY OF CINCINNATI



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MEMORANDUM IN SUPPORT

Cincinnati relies upon Duke Energy Ohio (“DE - Ohio”) to deliver the electric power necessary for various city-owned and/or operated governmental facilities. These facilities include the Greater Cincinnati Water Works, a department of the City, and the Metropolitan Sewer District of Greater Cincinnati, a sewer district owned by Hamilton County, but managed and operated by the City. In addition, the vast majority of Cincinnati residents rely upon DE - Ohio for the provision of their electric services.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, Cincinnati 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. Cincinnati 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 set forth in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, the City of Cincinnati respectfully requests that its motion to intervene in the above-captioned proceedings be granted.

Respectfully submitted on behalf of
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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 July 2012 *via* first class mail.



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Summary: Motion to Intervene and Memorandum in Support electronically filed by Teresa Orahod on behalf of City of Cincinnati