

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in its Natural Gas Distribution Rates.)	Case No. 12-1685-GA-AIR
)	
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.)	Case No. 12-1686-GA-ATA
)	
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan for Gas Distribution Service.)	Case No. 12-1687-GA-ALT
)	
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 12-1688-GA-AAM
)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF WAUSAU PAPER TOWEL & TISSUE, LLC**

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**Attorneys for Wausau Paper Towel &
Tissue, LLC**

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MOTION TO INTERVENE OF WAUSAU PAPER TOWEL & TISSUE, LLC

Wausau Paper Towel & Tissue, LLC, ("Wausau Paper") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code (OAC), for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On June 7, 2012, Duke Energy Ohio, Inc. ("Duke") filed notice of its intent to file an application for approval of an increase in its gas rates. Simultaneously, Duke filed a motion to set a test period and date certain, and, a request for a waiver of certain filing requirements. On July 9, 2012, Duke filed an Application to Increase its Gas Rates.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, Wausau Paper has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. Wausau Paper believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of Wausau Paper will not be adequately represented by other parties to these proceedings and, as such, Wausau Paper is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Further, Wausau Paper hereby requests that the following parties be included on the service list in these proceedings:

Mr. Thomas W. Craven
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Respectfully submitted,

/s/ Samuel C. Randazzo

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, Wausau Paper Towel & Tissue, LLC, ("Wausau Paper") has over 110 years of experience and currently employs over 2,500 employees throughout the United States. Wausau Paper is a leader in the manufacture and sales of premium and technical specialty papers used in industrial, commercial and consumer end markets and a complete line of towel, tissue, soap and dispensing systems for the away-from-home market.

Wausau Paper has a real and substantial interest inasmuch as these proceedings may directly or indirectly impact the provision of natural gas service to Wausau Paper's Middletown, Ohio mill. Specifically, Wausau Paper's direct interest in these proceedings is the result of the effect that these proceedings shall have upon the price, adequacy, and reliability of the natural gas supply and related services, within Ohio, including the areas presently served by Duke. Furthermore, the resolution of

these proceedings may impact Wausau Paper's ability to compete in the global economy. Therefore, Wausau Paper requests that the Commission grant this Motion to Intervene.

Respectfully submitted,

/s/ Samuel C. Randazzo
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**Attorneys for Wausau Paper Towel &
Tissue, LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Wausau Paper Towel & Tissue, LLC*, was served upon the following parties of record this 11th day of July, 2012 via first class mail, postage prepaid.

/s/ Samuel C. Randazzo
Samuel C. Randazzo

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Mr. Samuel C. Randazzo on behalf of Wausau Paper Towel & Tissue, LLC