

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy)	
Ohio, Inc., for an Increase in its Electric)	Case No. 12-1682-EL-AIR
Distribution Rates.)	
In the Matter of the Application of Duke Energy)	Case No. 12-1683-EL-ATA
Ohio, Inc., for Tariff Approval.)	
In the Matter of the Application of Duke Energy)	
Ohio, Inc., for Approval to Change Accounting)	Case No. 12-1684-EL-AAM
Methods.)	

MOTION TO INTERVENE OF MIAMI UNIVERSITY

Pursuant to Revised Code Section 4903.221 and Rule 4901-1-11, Ohio Administrative Code, Miami University moves to intervene in these proceedings. As further explained in the accompanying Memorandum in Support, Miami University has a real and substantial interest in these proceedings, and is so situated that the disposition of the proceedings may, as a practical matter, impair or impede its ability to protect that interest. Moreover, no other party adequately represents Miami University's interest.

WHEREFORE, Miami University respectfully requests that the Commission grant its motion to intervene.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

On June 7, 2012, Duke Energy Ohio, Inc. (Duke Energy) filed a notice of intent to file an application for an increase in its electric distribution rates, along with notice of intent to file related applications for tariff approval and for a change in accounting methods. Duke Energy filed the applications on July 9, 2012, and the Commission accepted the rate application for filing as of that date. A hearing schedule has now been set in this proceeding.

Rule 4901-1-11, O.A.C., states in relevant part that intervention shall be granted to an applicant if the person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties. Additionally, the Commission considers (1) the nature and extent of the prospective intervenor's interest, (2) the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, (3) whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings, and (4) whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

Miami University ("Miami") is an institution of higher learning and a member of the state's tax-funded university system. More than 22,000 students attend Miami. The main campus of Miami is located in Oxford, Ohio. Miami has regional campuses situated in Hamilton, Middletown, and West Chester. These campus locations are within Duke Energy's certified service area. Miami University is a Duke Energy of Ohio customer for electric service.

Miami has a direct interest in these applications because the applications may affect its purchase of electric service power from Duke Energy of Ohio.

No other party adequately represents Miami's interests. Further, Miami's participation will not unduly delay or unjustly prejudice any existing party; rather, Miami can significantly contribute

to the full development and equitable resolution of the factual issues. Finally, Miami notes that its intervention request is being offered in advance of the intervention deadline and thus is timely.

WHEREFORE, for the reasons stated herein, Miami respectfully requests that the Commission grant its motion to intervene in these proceedings.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the following parties of record via e-mail this 1st day of February, 2013.



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Summary: Motion Motion to Intervene electronically filed by M HOWARD PETRICOFF on behalf of Miami University