BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW 36 EAST SEVENTH STREET SUITE 1510 CINCINNATI, OHIO 45202 TELEPHONE (513) 421-2255

TELECOPIER (513) 421-2764

Via E-FILE

June 4, 2014

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case No. 14-841-EL-SSO and 14-842-EL-ATA

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

respectfully yours.

Mavid F. Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew Encl.

Cc:

Certificate of Service

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Duke Energy Ohio, Inc. For Authority To Establish A Standard Service Offer Pursuant To Section 4928.143, Revised Code, In The Form Of An Electric Security Plan, Accounting Modifications And Tariffs For Generation Service Case No. 14-841-EL-SSO

:

In The Matter Of The Application Of Duke Energy Ohio, Inc. For Authority To Amend Its Certified Supplier Tariff, P.U.C.O. No. 20 Case No. 14-842-EL-ATA

THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

David F. Boehm, Hsq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764 E-Mail: <u>dboehm@BKLlawfirm.com</u>

mkurtz@BKLlawfirm.com jkylercohn@BKLlawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

June 4, 2014

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Duke Energy Ohio, Inc. For Authority To Establish A Standard Service Offer Pursuant To Section 4928.143, Revised Code, In The Form Of An Electric Security Plan, Accounting Modifications And Tariffs For Generation Service Case No. 14-841-EL-SSO

:

In The Matter Of The Application Of Duke Energy Ohio, Inc. For Authority To Amend Its Certified Supplier Tariff, P.U.C.O. No. 20 Case No. 14-842-EL-ATA

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio should grant OEG leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Air Products and Chemicals, Inc., BP-Husky Refining, LLC, E.I. DuPont de Nemours & Co., Ford Motor Company, GE Aviation, General Motors LLC and Worthington Industries. These companies purchase electric distribution services from Duke Energy Ohio, Inc. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

David F Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: dboehm@BKLlawfirm.com

mkurtz@BKLlawfirm.com jkylercohn@BKLlawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

June 4, 2014

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 4th day of June, 2014 to the following:

Devid F. Boehm Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

*KUHNELL, DIANNE
DUKE ENERGY BUSINESS SERVICES
139 E. FOURTH STREET EA025
P.O. BOX 960
CINCINNATI OH 45201

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/4/2014 12:11:55 PM

in

Case No(s). 14-0841-EL-SSO, 14-0842-EL-ATA

Summary: Motion Ohio Energy Group's Motion to Intervene and Memorandum in Support electronically filed by Mrs. Jody Kyler Cohn on behalf of Ohio Energy Group