

**BEFORE
THE PUBLIC UTILITIES 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)	Case No. 14-841-EL-SSO
Code, in the Form of an Electric Security)	
Plan, Accounting Modifications and Tariffs)	
for Generation Service.)	

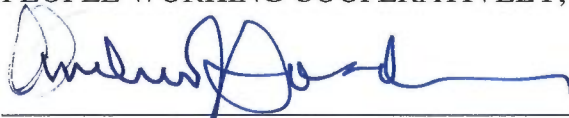
In the Matter of the Application of Duke)	
Energy Ohio for Authority to Amend its)	Case No. 14-842-EL-ATA
Certified Supplier Tariff, P.U.C.O. No. 20.)	

**MOTION TO INTERVENE BY
PEOPLE WORKING COOPERATIVELY, INC.**

People Working Cooperatively, Inc. ("PWC") hereby moves, pursuant to Ohio Revised Code ("O.R.C.") § 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, to intervene in the above-captioned proceeding for the reasons set forth in the Memorandum in Support, attached hereto.

Respectfully submitted on behalf of

PEOPLE WORKING COOPERATIVELY, INC.



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MEMORANDUM IN SUPPORT

PWC is a non-profit organization that has served consumers in the Duke Energy-Ohio ("DE-Ohio") service territory for over thirty-nine years by providing "whole house" weatherization and energy management services to low-income residential electricity consumers served by DE-Ohio. It owns and maintains the necessary tools and equipment to deliver its services and employs a full-time staff of skilled construction and administrative personnel, both of which greatly enhance PWC's ability to provide excellent and cost-efficient services to its clients. Although not a large organization compared with many for-profit concerns, PWC is the largest provider of these essential services in DE-Ohio's service territory, or in Ohio as a whole. DE-Ohio's funding is critically important to PWC to leverage contributions from various other sources, including government agencies, foundations, businesses and individuals, in the DE-Ohio service territory.

PWC's mission is to provide essential home repairs and services so that low-income homeowners, who are often also elderly and/or living with mobility issues, can remain in their homes; enjoy the opportunity to better control their heating and cooling costs and pay their electric bills; and live independently in a safe and sound environment. The preservation and enhancement of this community infrastructure and occupancy of PWC's clients' homes provides the community at large with direct and acknowledged benefits. Essentially, the provision of proper weatherization services gives PWC's clients the capability of lowering

their energy bills. All funding that PWC attracts is used for the provision of these services for its low-income residential electric and gas company clients.

PWC has been a regular intervenor in the electric cases of DE-Ohio, including its first ESP proceeding, Case No. 08-790-EL-SSO, its more recent MRO, Case No. 10-2586-EL-SSO, its most recent ESP case, 11-3549-EL-SSO, and the most recent electric and gas rate applications of DE-Ohio, Case Nos. 12-1682-EL-AIR and 12-1685-GA-AIR. PWC participation in the DE-Ohio cases began with DE-Ohio's electric transition plan proceeding, Case No. 99-1658-EL-ETP, in which PWC signed a stipulation that was accepted by the Commission that made provision for continued funding from DE-Ohio's predecessor company for weatherization programs during the period of the Commission's order in that proceeding. Since then, subsequent cases have included DE-Ohio commitments to fund energy efficiency and weatherization services through both shareholder funding and funding through base rates.

PWC meets the standards set forth in both the statute and the Commission's rules for intervention in this matter. It is, as described in Ohio Revised Code ("R.C.") Section 4903.221, a "person who may be adversely affected" by this proceeding insofar as any outcome in this proceeding may directly and indirectly affect funds available for, and consumers' ability to enjoy, the services PWC provides to low-income residential electric service consumers. Commission-approved stipulations in prior cases have provided for DE-Ohio's continued funding of weatherization and energy efficiency services for electric service customers, a portion of which is available for funding of PWC projects. PWC seeks leave to intervene in these proceedings to assure that DE-Ohio administered funding, as anticipated in the previous stipulations and Commission orders, continues and permits the

implementation of robust and efficacious energy management, weatherization and DSM programs for residential consumers in DE-Ohio's service territory, including PWC's clients. PWC submits that the vitality of these weatherization programs is more critical now more than ever in light of the recent enactment of S. B. 310, which maintains the status quo pending further study of targets for generation sourced through renewable energy and solar energy. Given the scheduled retirement of coal-fired generation, conservation measures for low income consumers, in aging housing stock most in need of it, must play a continued and expanding role in demand side management.

PWC should be permitted to participate as the Commission considers DE-Ohio's application in these proceedings in order that PWC may protect its "interest" pursuant to R.C. § 4903.221(B)(1) in the continued funding of such weatherization and energy efficiency services to its clients. R.C. §4928.143(B)(2)(h) explicitly provides that an ESP may include provisions implementing energy efficiency programs, which may allocate program costs across all customer classes. There is no other party or potential party in this proceeding whose interest in the continuation and growth of funding of weatherization and energy efficiency management services is as significant as it is for PWC. Moreover, as demonstrated in prior proceedings described herein, PWC's participation has not delayed and will not in this case unduly delay the proceedings, see R.C. 4903.221(B)(3).

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Insofar as PWC's intervention meets the criteria of Section 4903.221, it satisfies the standards set forth in the Commission's rule for intervention contained in O.A.C. Rule 4901-1-11, including that its motion is timely and is made by a person with a real and substantial interest in the outcome of this proceeding. For the foregoing reasons, PWC requests that the Commission grant its request to intervene.

Respectfully submitted on behalf of

PEOPLE WORKING COOPERATIVELY, INC.



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion and Memorandum in Support were delivered by U.S. Mail (postage prepaid), or electronic mail on this 27th day of June, 2014 to the following parties.



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Summary: Motion Motion to Intervene and Memorandum in Support electronically filed by Mr. Andrew J Sonderman on behalf of People Working Cooperatively, Inc.