

**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,)	Case No. 14-0841-EL-SSO
Revised 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)	Case No. 14-0842-EL-ATA
Ohio for Authority to Amend Its Certified Supplier)	
Tariff, P.U.C.O. No. 20)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF THE GREATER CINCINNATI HEALTH COUNCIL**

The Greater Cincinnati Health Council ("GCHC") hereby moves the Public Utilities Commission of Ohio ("Commission") pursuant to Revised Code § 4903.221 and Commission Rule 4901-1-11, to intervene as a party to the above-captioned proceedings. The grounds in support of this Motion to Intervene are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Douglas E. Hart

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MEMORANDUM IN SUPPORT

On May 29, 2014 Duke Energy Ohio filed an Application in the above captioned proceedings for approval of a standard service offer under Revised Code § 4928.143. GCHC is a non-profit association of hospitals and other health care facilities who individually are substantial consumers of electric energy and are generally located within the distribution service area of Duke Energy Ohio. The application filed by Duke Energy Ohio, if granted by the Commission, would establish the terms of electric service and could significantly impact the prices paid by GCHC's members for electric service.

The standard for intervention in Commission proceedings is governed by Revised Code § 4903.221, as further stated in Commission Rule 4901-1-11, Ohio Administrative Code:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

(2) 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.

Factors that the Commission considers when applying the rule include the nature of the intervenor's interest, the extent that interest is represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding.

In a June 6, 2014 Entry, the Attorney Examiner established a July 7, 2014 deadline for intervention. Therefore, this Motion to Intervene is timely.

The GCHC has a real and substantial interest in this proceeding because many of its members are substantial consumers of electric service and most are electric distribution service

customers of Duke Energy Ohio. The GCHC participated in Duke Energy Ohio's most recent SSO proceeding, Case No. 11-3549-EL-SSO, which resulted in Duke Energy Ohio's current ESP, as well as in previous Duke Energy Ohio SSO proceedings, Case No. 10-2586-EL-SSO, and Case No. 08-920-EL-SSO. Almost all of GCHC's hospital members are not for profit organizations. Utility costs represent a substantial portion of hospitals' operating expenses, which affects the cost of health care in Ohio. The availability of a reliable and robust electric supply is also critical to patient safety and disaster preparedness. The ESP being offered by Duke Energy Ohio does not propose to continue certain features of past ESPs that were of unique benefit to GCHC members. While several other parties have already sought intervention in this proceeding, none of them is similarly situated to or represents the interests of the GCHC or its members.

Consistent with the requirements of Revised Code § 4903.221 and Commission Rule 4901-1-11, this motion is timely; the GCHC has a real and substantial interest herein; its interest is not represented by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns raised in these proceedings; and its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

For these reasons, the GCHC respectfully requests that this motion to intervene in the above-captioned proceedings be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon the parties of record listed below this 27th day of June, 2014 by electronic service.

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Summary: Motion Motion to Intervene and Memorandum in Support electronically filed by Mr. Douglas E. Hart on behalf of Greater Cincinnati Health Council