

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

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

**MOTION TO INTERVENE
OF
THE CITY OF CINCINNATI**

The City of Cincinnati (“Cincinnati” or “City”) hereby moves, pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, Cincinnati submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without Cincinnati’s participation may impair or impede its ability to protect that interest, and that its participation in these proceedings will contribute to a just result. Cincinnati further submits that no existing party represents its interest in these proceedings and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

MEMORANDUM IN SUPPORT

Cincinnati relies upon Duke Energy Ohio, Inc. (“Duke”) to deliver the electric power necessary for various city-owned and/or operated governmental facilities. These facilities include the Greater Cincinnati Water Works, a department of the City, and the Metropolitan Sewer District of Greater Cincinnati, a sewer district owned by Hamilton County, but managed and operated by the City. Collectively, the City consumes over 259 million kWh per year and spends in excess of \$14 million on electricity. In addition, the vast majority of Cincinnati residents either participate in the City’s electric aggregation program, or rely upon Duke for the provision of their electric services.

On May 29, 2014, Duke filed an Application for authority to establish a standard service offer in the form of an electric security plan (“ESP”) for a term commencing June 1, 2015 and ending May 31, 2018 along with approval of several tariff and accounting changes including a number of new, non-bypassable riders that will affect distribution service customers of Duke. The application filed by Duke, if granted by the Commission, will significantly impact the price and quality of electric services provided by Duke to the City and its residents.

Consistent with the requirements of R.C. 4903.221 and OAC Rule 4901-1-11, Cincinnati is a real party in interest herein, whose interest is not now represented, who can make a contribution to these proceedings, and who will not unduly delay these proceedings or prejudice any existing party. Cincinnati submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, the City of Cincinnati respectfully requests that its motion to intervene in the above-captioned proceedings be granted.

Respectfully submitted on behalf of
CITY OF CINCINNATI



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served via electronic mail upon the parties of record listed below this 8th day of July 2014.



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Summary: Motion to Intervene of the City of Cincinnati electronically filed by Teresa Orahod on behalf of Thomas O'Brien