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**Via E-file**

May 11, 2017

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

**In re: Case Nos. 17-0872-EL-RDR, 17-0873-EL-ATA, and 17-0874-EL-AAM**

Dear Sir/Madam:

Please find attached the MOTION TO INTERVENE OF THE CITY OF CINCINNATI e-filed today in the above-referenced dockets.

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

Respectfully yours,



Kurt J. Boehm, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew  
Encl.

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval to Modify Rider PSR</b>	:	<b>Case No. 17-872-EL-RDR</b>
	:	
	:	
<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval to Amend Rider PSR</b>	:	<b>Case No. 17-873-EL-ATA</b>
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	:	
<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval To Change Accounting Methods</b>	:	<b>Case No. 17-874-EL-AAM</b>
	:	

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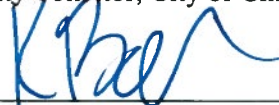
**MOTION FOR LEAVE TO INTERVENE OF  
THE CITY OF CINCINNATI**

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

Respectfully submitted,

Paula Boggs Muething  
City Solicitor, City of Cincinnati



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May 11, 2017

**ATTORNEY FOR THE CITY OF CINCINNATI  
CO-COUNSEL FOR CITY SOLICITOR OF  
THE CITY OF CINCINNATI**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval to Modify Rider PSR</b>	<b>:</b>	<b>Case No. 17-872-EL-RDR</b>
	<b>:</b>	
	<b>:</b>	
<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval to Amend Rider PSR</b>	<b>:</b>	<b>Case No. 17-873-EL-ATA</b>
	<b>:</b>	
	<b>:</b>	
<b>In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval To Change Accounting Methods</b>	<b>:</b>	<b>Case No. 17-874-EL-AAM</b>

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**MEMORANDUM IN SUPPORT OF  
THE CITY OF CINCINNATI'S MOTION TO INTERVENE**

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The City of Cincinnati ("Cincinnati" or "City") 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 250 million kWh per year.

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.

Respectfully submitted,

Paula Boggs Muething  
City Solicitor, City of Cincinnati



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May 11, 2017

**ATTORNEY FOR THE CITY OF CINCINNATI  
CO-COUNSEL FOR CITY SOLICITOR OF  
THE CITY OF CINCINNATI**

## CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 11<sup>th</sup> day of May, 2017 to the following:

  
Kurt J. Boehm, Esq.

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**Case No(s). 17-0872-EL-RDR, 17-0873-EL-ATA, 17-0874-EL-AAM**

Summary: Motion City of Cincinnati Motion to Intervene electronically filed by Mr. Kurt J. Boehm on behalf of City of Cincinnati