

**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)	Case No. 17-1263-EL-SSO
Electric Security Plan, Accounting Modifi-)	
cations and Tariffs for Generation Service.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Authority to Amend its)	Case No. 17-1264-EL-ATA
Certified Supplier Tariff, P.U.C.O. No. 20.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Authority to Defer)	Case No. 17-1265-EL-AAM
Vegetation Management Costs.)	

MOTION TO INTERVENE OF MIAMI UNIVERSITY

Pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code Rule 4901-1-11, Miami University moves to intervene in the above-styled proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, Miami University respectfully requests that the Public Utilities Commission of Ohio grant this motion to intervene and that it be made a full party of record.

Respectfully Submitted,

Mike DeWine
Attorney General

/s/ Michael J. Settineri

Michael J. Settineri (0073369)
Special Assistant Attorney General
VORYS, SATER, SEYMOUR AND PEASE LLP
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
614-464-5462
614-719-5146 (fax)
mjsettineri@vorys.com

Attorneys for Miami University

**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE OF MIAMI UNIVERSITY**

Ohio Revised Code Section (R.C.) 4903.221 and Ohio Administrative Code Rule 4901-1-11 establish the standard for intervention in the above-styled proceeding as a full party of record. Rule 4901-1-11 of the Ohio Administrative Code states in part:

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.

In addition to establishment of a direct interest, the factors that the Public Utilities Commission of Ohio ("Commission") considers in implementing the above rule are 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. *See, also*, R.C. 4903.221(B) upon which the above rule is authorized.

Miami University is a state-supported institution of higher learning and is located in Oxford, Ohio. Miami is an electric service customer of Duke Energy Ohio, Inc. ("Duke") and has its own significant amount of generation.

On June 1, 2017, Duke filed an application for approval of an electric security plan pursuant to R.C. 4928.143. Duke's current electric security plan will expire on May 31, 2018. Duke is proposing an electric security plan that is intended to last until May 31, 2024, and Duke proposes changes to its services, including proposed modifications to existing non-bypassable riders and proposed new non-bypassable riders. Miami University has a real and substantial interest in this case as a result of being a customer of Duke and having substantial amounts of its

own generation.

This motion for intervention complies with the intervention deadline established for these proceedings by the Attorney Examiner's Entry issued July 21, 2017. Additionally, Miami University's interest is not represented by existing parties. Miami University was a party to Duke's last two electric security plan proceedings (Case Nos. 14-841-EL-SSO et al. and 11-3549-EL-SSO et al.) and can again contribute to a just and expeditious resolution of the issues involved in these proceedings. Thus, Miami University's intervention request is timely and should not unduly delay the instant proceedings.

WHEREFORE, Miami University respectfully requests that the Commission grant this motion for leave to intervene and that it be made a full party of record.

Respectfully Submitted,

Mike DeWine
Attorney General

/s/ Michael J. Settineri
Michael J. Settineri (0073369)
Special Assistant Attorney General
VORYS, SATER, SEYMOUR AND PEASE LLP
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
614-464-5462
614-719-5146 (fax)
mjsettineri@vorys.com

Attorneys for Miami University

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served (via electronic mail) on the 11th day of September 2017 upon the persons listed below.

/s/ Michael J. Settineri

Michael J. Settineri

Amy.spiller@duke-energy.com
Rocco.DAscenzo@duke-energy.com
Elizabeth.watts@duke-energy.com
Jeanne.kingery@duke-energy.com
william.michael@occ.ohio.gov
kevin.moore@occ.ohio.gov
mkurtz@BKLlawfirm.com
jkylercohn@BKLlawfirm.com
joliker@igsenergy.com
mnugent@igsenergy.com
bojko@carpenterlipps.com
perko@carpenterlipps.com
slessor@calfee.com
jang@calfee.com
talexander@calfee.com
mkeaney@calfee.com
rick.sites@ohiohospitals.org
dborchers@bricker.com
dparram@bricker.com

mdortch@kravitzllc.com
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
glover@whitt-sturtevant.com
cmooney@ohiopartners.org
fdarr@mwncmh.com
mpritchard@mwncmh.com
paul@carpenterlipps.com
eakhbari@bricker.com
mfleisher@elpc.org
tdougherty@theOEC.org
mleppla@theOEC.org
steven.beeler@ohioattorneygeneral.gov
charris@spilmanlaw.com
dwilliamson@spilmanlaw.com
lbrandfass@spilmanlaw.com

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Case No(s). 17-1263-EL-SSO, 17-1264-EL-ATA, 17-1265-EL-AAM

Summary: Motion to Intervene electronically filed by Mr. Michael J. Settineri on behalf of Miami University