

FILE

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Via Overnight Mail

July 30, 2007

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

In re: Case No. 07-589-GA-AIR, 07-590-GA-ALT and 07-591-GA-AAM

Dear Sir/Madam:

Please find enclosed an original and ten (10) copies of the MOTION FOR LEAVE TO INTERVENE OF THE OHIO ENERGY GROUP filed in the above-referenced matter.

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

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
BOEHM, KURTZ & LOWRY

DFBkew
Encl.

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronically and by ordinary mail, unless otherwise noted, this 30TH day of July, 2007 to the following:

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David F. Boehm, Esq.
Michael L. Kurtz, Esq.


**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Duke Energy Ohio, Inc. For An Increase In Gas Rates	:	Case Nos.	07-589-GA-AIR
	:		07-590-GA-ALT
In The Matter Of The Application Of Duke Energy Ohio, Inc. For Approval Of An Alternative Rate Plan For Its Gas Distribution Service	:		07-591-GA-AAM
	:		
In The Matter Of The Application Of Duke Energy Ohio, Inc. Approval To Change Account Methods	:		

**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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July 30, 2007

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Duke Energy	:	
Ohio, Inc. For An Increase In Gas Rates	:	Case Nos. 07-589-GA-AIR
	:	07-590-GA-ALT
In The Matter Of The Application Of Duke Energy	:	07-591-GA-AAM
Ohio, Inc. For Approval Of An Alternative Rate	:	
Plan For Its Gas Distribution Service	:	
	:	
In The Matter Of The Application Of Duke Energy	:	
Ohio, Inc. Approval To Change Account Methods	:	

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**


Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant the Ohio Energy Group ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: General Electric – Aviation, Worthington Industries, Ford Motor Company, and The Procter & Gamble Company. These companies use large quantities of natural gas in the manufacture of their products and transport this gas through Duke Energy, Ohio. Therefore, the interests of OEG's members may be indirectly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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July 26, 2007