
MEMORANDUM IN SUPPORT

Cincinnati relies upon Duke Energy Ohio (“DE - Ohio”) 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. In addition, the vast majority of Cincinnati residents rely upon DE - Ohio for the provision of their electric services.

On June 20, 2011, DE – Ohio filed an Application for authority to establish a standard service offer in the form of an electric security plan (“ESP”) along with approval of several tariff and accounting changes and approval of a new corporate separation plan. The ESP includes a competitive bid process (“CBP”) for the procurement of energy with the first auction to be conducted no later than December 1, 2011 for delivery on January 1, 2012. The plan would impose a non-bypassable capacity charge on customers, ostensibly derived on a cost basis. DE – Ohio proposes a ten-year term for its ESP rather than the traditional three-year term. The plan includes several other new and novel features as well. The applications filed by DE – Ohio, if granted by the Commission, will significantly impact the price and quality of electric services provided by DE – Ohio 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.

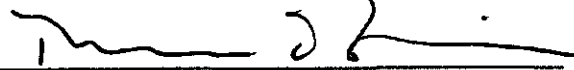
Respectfully submitted on behalf of
CITY OF CINCINNATI



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 21st day of June 2011 via first class mail.



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