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June 23, 2011

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

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PUCO


In re: Case No. 11-3549-EL-SSO, 11-3550-EL-ATA and 11-3551-EL-UNC

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of the MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP filed today 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.

Cc: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 23rd day of June, 2011 to the following:



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**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Duke Energy Ohio For Approval To Establish A Standard Service Offer Pursuant To Section 4928.143, Revised Code, In The Form Of An Electric Security Plan, Accounting Modifications And Tariffs For Generation Service	:	Case No. 11-3549-EL-SSO
	:	
	:	
	:	
	:	
In The Matter Of The Application Of Duke Energy Ohio For Authority To Amend Its Certified Supplier Tariff, P.U.C.O. No. 20	:	Case No. 11-3550-EL-ATA
	:	
	:	
In The Matter Of The Application Of Duke Energy Ohio For Authority To Amend Its Corporate Separation Plan	:	Case No. 11-3551-EL-UNC

**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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June 23, 2011

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Duke Energy Ohio For : Case No. 11-3549-EL-SSO
Approval To Establish A Standard Service Offer Pursuant :
To Section 4928.143, Revised Code, In The Form Of An :
Electric Security Plan, Accounting Modifications And :
Tariffs For Generation Service :

In The Matter Of The Application Of Duke Energy Ohio For : Case No. 11-3550-EL-ATA
Authority To Amend Its Certified Supplier Tariff, P.U.C.O. :
No. 20 :

In The Matter Of The Application Of Duke Energy Ohio For : Case No. 11-3551-EL-UNC
Authority To Amend Its Corporate Separation Plan :

**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 should grant 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: AK Steel Corporation, Air Products & Chemicals, Inc., BP-Husky Refining, LLC, E.I. DuPont de Nemours & Co., Ford Motor Company, GE Aviation, General Motors LLC, The Procter & Gamble Co., and Worthington Industries. These companies purchase electric distribution services from Duke Energy Ohio, Inc. Therefore, the interests of OEG's members may be directly 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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June 23, 2011