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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- In the Matter of the Application of Duke Energy)
Ohio for Authority to Establish a Standard)
Service Offer Pursuant to Section 4928.143,)
Revised Code, in the Form of an Electric) Case No. 11-3549-EL-SSO
Security Plan, Accounting Modifications and)
Tariffs for Generation Service.)

- 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

MOTION TO INTERVENE OF THE OHIO MANUFACTURERS' ASSOCIATION

Pursuant to Section 4903.221, Revised Code ("RC"), and Rule 4901-1-11, Ohio Administrative Code ("OAC"), the Ohio Manufacturers' Association ("OMA") hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMA has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede the OMA's ability to protect that interest. OMA believes that its participation will not unduly prolong or delay this proceeding and that OMA will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMA's interests will not be adequately represented by other parties to

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this proceeding. Accordingly, for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMA respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted on behalf of
THE OHIO MANUFACTURERS' ASSOCIATION



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio for Authority 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

MEMORANDUM IN SUPPORT

On June 20, 2011, Duke Energy Ohio, Inc. ("DEO") filed an Application for authority to establish a standard service offer in the form of an approximately ten year 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 cost-based, nonbypassable capacity charge on customers. The applications filed by DEO, if granted by the Commission, will significantly impact the price and quality of electric services provided by DEO to the OMA and its members.

The OMA is the only statewide association exclusively serving manufacturers. It has more than 1,600 Ohio manufacturing companies as members. The OMA's

member companies consume significant amounts of electrical energy and must rely on DEO to deliver the electric power necessary in their operations. The OMA members purchase electric power services from DEO, and will be affected by the Commission's determination in this matter. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of Section 4903.221, RC, and Rule 4901-1-11, OAC, the OMA 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. The OMA 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. The OMA's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership.

WHEREFORE, the OMA respectfully requests that its motion to intervene in the above-captioned proceedings be granted.

Respectfully submitted on behalf of
THE OHIO MANUFACTURERS' ASSOCIATION



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon the parties of record listed below this 28th day of June 2011 via first class mail.



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