

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Duke )  
Energy Ohio, Inc. for an Energy Efficiency )  
Cost Recovery Mechanism and for Approval )  
of Additional Programs for Inclusion in its )  
Existing Portfolio. )

Case No. 11-4393-EL-RDR

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MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF BOTTOMLINE RESOURCE TECHNOLOGIES, LLC

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August 12, 2011

ATTORNEYS FOR BOTTOMLINE RESOURCE  
TECHNOLOGIES, LLC

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**MOTION TO INTERVENE OF BOTTOMLINE RESOURCE TECHNOLOGIES, LLC**

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BottomLine Resource Technologies, LLC ("BottomLine") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On July 20, 2011, Duke Energy Ohio, Inc. ("Duke") filed an application proposing the creation of an energy efficiency/peak demand reduction rider ("Rider EE/PDR") to supplant its save-a-watt rider at its expiration on December 31, 2011. As proposed, Rider EE/PDR will recover the cost of Duke's energy efficiency compliance programs and portfolio of EE/PDR programs. According to Duke, Rider EE/PDR will recover program costs associated with each program and an incentive in the form of the avoided cost benefits realized.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, BottomLine has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the

disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. BottomLine believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of BottomLine will not be adequately represented by other parties to the proceeding and, as such, BottomLine is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

  
\_\_\_\_\_

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TECHNOLOGIES, LLC**

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**MEMORANDUM IN SUPPORT**

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In support of this Motion to Intervene, BottomLine Resource Technologies, LLC (“BottomLine”) states that it is an energy services company that provides board and executive level consulting, research and advisory services on matters addressing the electric energy industry. BottomLine’s services assist clients in business planning by answering questions about evolving energy technologies and changing regulations. The company and its principals and management have designed, built, owned and operated energy facilities, and have carried out the management of complex energy reduction and energy management operations, throughout the United States.

BottomLine’s Motion to Intervene is timely. Motions to Intervene are due by August 12, 2011. Moreover, BottomLine’s participation will not unduly prolong or delay this proceeding.

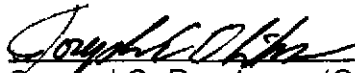
The Public Utilities Commission of Ohio (“Commission”) has recognized the important role that energy services companies serve in EE/PDR Programs.<sup>1</sup> BottomLine has a real and substantial interest inasmuch as this proceeding may directly

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<sup>1</sup> *In the Matter of a Mercantile Application Pilot Program Regarding Special Arrangements with Electric Utilities and Exemptions from Energy Efficiency and Peak Demand Reduction Riders*, Case No. 10-834-EL-POR, Entry at ¶ 9 (September 15, 2010).

or indirectly impact the price, adequacy, and reliability of electric service to BottomLine's clients. BottomLine's clients' interests will be directly impacted by the resolution of this matter, which will establish the terms and incentives in Duke Energy Ohio's EE/PDR programs. BottomLine's ability to assist its clients in reclaiming investments in energy efficiency projects will be directly impacted by the disposition of this proceeding, and no other party in this proceeding represents the interests of BottomLine.

Respectfully submitted,



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**ATTORNEYS FOR BOTTOMLINE RESOURCE  
TECHNOLOGIES, LLC**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of BottomLine Resource Technologies, LLC* was served upon the following parties of record this 12th day of August, 2011, via electronic transmission, hand-delivery, or ordinary U.S. mail, postage prepaid.

  
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