

**BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255  
TELECOPIER (513) 421-2764

**Via E-File**

April 12, 2012

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

**In re: Case Nos. 12-1126-EL-UNC**

Dear Sir/Madam:

Please find attached the MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP for filing 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,

A handwritten signature in blue ink that reads "Mike Kurtz" with a small superscript "4" to the right.

Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
Jody M. Kyler, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Encl.  
Cc: Certificate of Service

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Ohio Power :  
Company For Approval Of Full Legal Corporate : **Case No. 12-1126-EL-UNC**  
Separation And Amendment To Its Corporate :  
Separation Plan :

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**MOTION TO INTERVENE OF THE  
THE OHIO ENERGY GROUP**

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Pursuant to the Ohio Rev. Code §4903.221 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,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

[jkyler@BKLawfirm.com](mailto:jkyler@BKLawfirm.com)

March 19, 2012

**COUNSEL FOR THE OHIO ENERGY GROUP**



Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michael L. Kurtz" with a small mark above the "z". The signature is written over a horizontal line.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

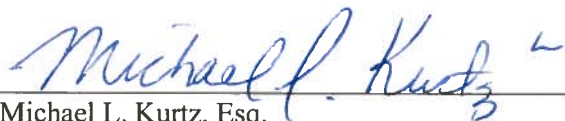
[jkyler@BKLawfirm.com](mailto:jkyler@BKLawfirm.com)

April 12, 2012

**COUNSEL FOR THE OHIO ENERGY GROUP**

## 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 12<sup>th</sup> day of April, 2012 to the following:



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

\*MCBRIDE, LAURA C. MS.  
CALFEE, HALTER & GRISWOLD LLP  
1400 KEYBANK CENTER 800 SUPERIOR AVE.  
CLEVELAND OH 44114

NOURSE, STEVEN T. MR.  
AMERICAN ELECTRIC POWER  
1 RIVERSIDE PLAZA  
COLUMBUS OH 43215

\*KUHNELL, DIANNE  
DUKE ENERGY BUSINESS SERVICES  
139 E. FOURTH STREET EA025 P.O. BOX 960  
CINCINNATI OH 45201

\*BINGHAM, DEB J. MS.  
OFFICE OF THE OHIO CONSUMERS' COUNSEL  
10 W. BROAD ST., 18TH FL.  
COLUMBUS OH 43215

\*COCHERN, CARYS  
DUKE ENERGY  
155 EAST BROAD ST 21ST FLOOR  
COLUMBUS OH 43215

\*PRITCHARD, MATTHEW R. MR.  
MCNEES WALLACE & NURICK  
21 EAST STATE STREET #1700  
COLUMBUS OH 43215

DUKE ENERGY  
1000 EAST MAIN ST  
MAIL DROP WP 890  
PLAINFIELD IN 46168

MCMAHON, ROBERT A ATTORNEY  
EBERLY MCMAHON LLC  
2321 KEMPER LANE SUITE 100  
CINCINNATI OH 45206

DUKE ENERGY  
COMMERCIAL ASSET MANAGEMENT, INC.  
139 E. FOURTH STREET, 1303-MAIN P.O. BOX 961  
CINCINNATI OH 45201-0960

DUKE ENERGY RETAIL SALES LLC  
MATT WALZ VICE PRESIDENT  
139 EAST FOURTH STREET EA 600  
CINCINNATI OH 45202

OHIO CONSUMERS' COUNSEL  
10 W. BROAD STREET SUITE 1800  
COLUMBUS OH 43215-3485

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**Case No(s). 12-1126-EL-UNC**

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group