

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Gas Rates.)	Case No. 12-1685-GA-AIR
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Tariff Approval.)	Case No. 12-1686-GA-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of an Alternative Rate Plan for Gas Distribution Service.)	Case No. 12-1687-GA-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 12-1688-GA-AAM
)	

**MOTION TO INTERVENE
OF
CITY OF CINCINNATI**

The City of Cincinnati (“Cincinnati” or “City”) hereby moves, pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, Cincinnati submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without Cincinnati’s participation may impair or impede its ability to protect that interest, and that its participation in these proceedings will contribute to a just result. Cincinnati further submits that no existing party represents its interest in these proceedings and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

Respectfully submitted on behalf of
CITY OF CINCINNATI



Thomas J. O'Brien
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2335
Facsimile: (614) 227-2390
E-mail: tobrien@bricker.com

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MEMORANDUM IN SUPPORT

Cincinnati relies upon Duke Energy Ohio (“DE - Ohio”) to deliver natural gas 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 natural gas service. The application filed by DE - Ohio, if granted by the Commission, will significantly impact the price paid by the City and its residents for natural gas service.

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
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Columbus, OH 43215-4291
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Facsimile: (614) 227-2390
E-mail: tobrien@bricker.com

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 3rd day of July 2012 *via* first class mail.



Thomas J. O'Brien

Amy B. Spiller
Rocco D'Ascenzo
Elizabeth H. Watts
Jeanne W. Kingery
Duke Energy Ohio, Inc.
139 E. Fourth Street, 1303-Main
PO Box 961
Cincinnati, OH 45201-0960
Amy.spiller@duke-energy.com
Rocco.dascenzo@duke-energy.com
Jeanne.kingery@duke-energy.com
Elizabeth.watts@duke-energy.com

Mark S. Yurick
Zachary D. Kravitz
Taft Stettinius & Hollister LLP
65 East State Street, Suite 1000
Columbus, OH 43215
myurick@taftlaw.com
zkravitz@taftlaw.com

A. Brian McIntosh
McIntosh & McIntosh
1136 Saint Gregory Street, Suite 100
Cincinnati, OH 45202
brian@mcintoshlaw.com

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Case No(s). 12-1685-GA-AIR, 12-1686-GA-ATA, 12-1687-GA-ALT, 12-1688-GA-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Teresa Orahod on behalf of City of Cincinnati