

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio,    )  
Inc., for the Establishment of a Charge Pursuant to    ) Case No. 12-2400-EL-UNC  
Revised Code Section 4909.18.                                )

In the Matter of the Application of Duke Energy Ohio,    )  
Inc., for Approval to Change Accounting Methods.        ) Case No. 12-2401-EL-AAM

In the Matter of the Application of Duke Energy Ohio,    )  
Inc., for the Approval of a Tariff for a New Service.     ) Case No. 12-2402-EL-ATA

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**MOTION TO INTERVENE  
OF  
CITY OF CINCINNATI**

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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



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**MEMORANDUM IN SUPPORT**

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Cincinnati relies upon Duke Energy Ohio (“DE - Ohio”) to deliver the electric power 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. Collectively, the City consumes over 259 million kWh per year and spends in excess of \$14 million on electricity. In addition, the vast majority of Cincinnati residents rely upon DE - Ohio for the provision of their electric services.

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  
CITY OF CINCINNATI



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## **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 7<sup>th</sup> day of September 2012 *via* electronic mail.



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**Case No(s). 12-2400-EL-UNC, 12-2401-EL-AAM, 12-2402-EL-ATA**

Summary: Motion to Intervene electronically filed by Teresa Orahoad on behalf of City of Cincinnati