

**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-ALT
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 THE OHIO MANUFACTURERS' ASSOCIATION

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, 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 this proceeding. Accordingly, and 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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MEMORANDUM IN SUPPORT

On July 9, 2012, Duke Energy Ohio, Inc. ("Duke") filed an Application for Increase in Gas Distribution Rates, an Application for Tariff Approval, an Application for an Alternative Rate Plan, and an Application for Approval to Change Accounting Methods. The members of OMA will be impacted by the Commission's decision relating to Duke's gas distribution rates, and the OMA should be permitted to intervene in the above-captioned proceeding.

OMA is the only statewide association exclusively serving manufacturers. It has more than 1,600 Ohio manufacturing companies as members. OMA members purchase gas power services from Duke, and will be affected by the Commission's determination in this matter. Accordingly, the OMA should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMA submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding 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.

Accordingly, the OMA respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

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 was served upon the parties of record listed below this 13th day of September 2012 via electronic transmission and/or first class mail.



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Summary: Motion to Intervene and Memorandum in Support electronically filed by Teresa Orahod on behalf of Ohio Manufacturers' Association