

MEMORANDUM IN SUPPORT

PWC is a unique non-profit organization that has served consumers in the Duke Energy-Ohio (fka The Cincinnati Gas & Electric Company or “CG&E” and “Cinergy”) (“DE-Ohio”) service territory for thirty-seven years by providing weatherization and energy management services to low-income residential consumers of services provided by DE-Ohio. It owns and maintains the necessary tools and equipment to deliver its services and employs a full-time staff of skilled construction and administrative personnel, both of which greatly enhance PWC’s ability to provide excellent and cost-efficient services to its clients. PWC broadens its ability to provide client services by employing utility company funding as seed money to obtain additional funding from others, including government agencies, foundations, businesses and individuals, in the relevant service territory. With these combined contributions from the leveraged dollars, PWC can provide even more services in the electric company’s service territory than can be provided using only the electric company’s contribution.

PWC moves to intervene in the above-named proceedings because it wishes to provide its services to the low-income residential customers of The Dayton Power & Light Company (“DP&L”), where, PWC understands, the demand for such services is compelling. Further, it wishes to participate to assure that the Commission continue to support The Dayton Power & Light Company in its continued funding of these services for its low-income residential customers.

PWC’s mission is to provide essential home repairs and services so that low-income homeowners, who are often also elderly and/or living with mobility issues, can remain in their homes, enjoying the opportunity to better control their heating and cooling costs and pay their energy bills, and living independently in

a safe and sound environment. The preservation of this community infrastructure and occupancy of PWC's clients' homes provides the community at large with direct and acknowledged benefits. Essentially, the provision of proper weatherization services gives PWC's clients the capability of lowering their energy bills. All funding that PWC attracts is used for the provision of these services for its low-income residential electric and gas company clients.

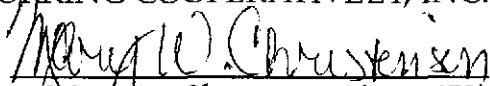
PWC has been a regular intervenor in the electric and gas cases of DE-Ohio, including DE-Ohio's first ESP proceeding, Case No. 08-790-EL-SSO, its more recent ESP, Case No. 11-3549-EL-SSO, and in the last DE-Ohio gas rate increase proceeding of DE-Ohio, Case No. 07-589-GA-AIR. PWC has filed to intervene in the pending DE-Ohio electric and gas rate cases.

PWC meets the standards set forth in both the statute and the Commission's rules for intervention in this matter. It is, as described in Ohio Revised Code ("R.C.") Section 4903.221, a "person who may be adversely affected" by this proceeding insofar as any outcome in this proceeding may directly and indirectly affect funds available for and consumers' ability to enjoy the services PWC wishes to provide to low-income residential electric service consumers in DP&L's service territory. As stated above, PWC intervenes in this proceeding to assure the Commission's continued approval of funding by DP&L for the continuation and implementation of robust and efficacious energy management, weatherization and DSM programs as anticipated under Senate Bill 221 for residential consumers in DP&L's service territory eligible for PWC's services. And to protect its "interest," R.C. Section 4903.221 (B)(1), in the continued funding of such weatherization and energy efficiency services to its clients, PWC should be allowed to participate as the Commission considers DP&L's application in the instant case. There is no other party in this proceeding

whose interest in the availability and continuation of funding of weatherization and energy efficiency and management services in the DP&L service territory is as substantial as it is for PWC. PWC's approach to the provision of these critical services and the unmet need for their provision in the DP&L service territory argues for PWC's opportunity to participate in this proceeding. PWC's participation has not in the past in its appearances before the Commission and will not in this case unduly delay the proceedings, R.C. Section 4903.221 (B)(3).

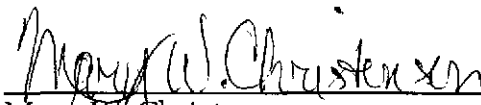
Insofar as PWC's intervention meets the criteria of Section 4903.221, it satisfies the standards set forth in the PUCO's rule for intervention contained in Ohio Administrative Code Section 4901-1-11, including that its motion is timely and is made by a person with a real and substantial interest in the outcome of this proceeding. For the foregoing reasons, PWC requests that the Commission grant its request to intervene.

Respectfully submitted on behalf of
PEOPLE WORKING COOPERATIVELY, INC.


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CERTIFICATE OF SERVICE

I hereby certify that this Motion to Intervene has been served upon the parties of record who are listed on the attached service list by first class, postage prepaid U.S. Mail and by e-mail this 17th day of December 2012.


Mary W. Christensen

The Dayton Power & Light Company Case No. 12-426-EL-SSO
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