

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy )  
Ohio, Inc. for Authority to Establish an ) Case No. 14-75-EL-POR  
Energy Efficiency Pilot Program. . )

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**MOTION TO INTERVENE  
OF  
OHIO PARTNERS FOR AFFORDABLE ENERGY**

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Ohio Partners for Affordable Energy (“OPAE”) respectfully moves to intervene in this proceeding before the Public Utilities Commission of Ohio (“Commission”) regarding the application filed by Duke Energy Ohio, Inc., (“Duke”) for authority to establish an energy efficiency pilot program. The reasons the Commission should grant this motion to intervene are further set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/Colleen L. Mooney  
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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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Ohio Partners for Affordable Energy (“OPAE”) requests permission to intervene in this matter pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules contained in Section 4901-1-11 of the Ohio Administrative Code. The Commission, in ruling upon a motion to intervene in its proceedings, shall consider the following criteria:

- (1) The nature and extent of the intervenor’s interest.
- (2) The legal position advanced by the prospective intervenor and its probable relationship to the merits of the case.
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding.
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

Duke’s application requests approval of a pilot program that assesses whether co-marketing and coordinating Duke’s residential Smart Saver program with the Greater Cincinnati Energy Alliance’s (“GCEA”) energy efficiency investments (including leveraging GCEA’s GC-Help financing program) will result in a higher customer adoption of energy efficiency measures. Duke’s residential Smart Saver program provides financial incentives for residential customers to perform energy-efficiency improvements to their homes. GCEA also works to

encourage residential energy efficiency investments in the greater Cincinnati area through low-cost financing.

According to the application, Duke and GCEA seek to coordinate their efforts to leverage existing resources and increase overall customer adoption of energy efficiency. After discussions with GCEA, Duke seeks approval of the resulting pilot program and cost recovery for the pilot program. Application 2-5. OPAE is a signatory party to the Stipulation and Recommendation in Case No. 13-431-EL-POR, which is a basis for this pilot program. Stipulation and Recommendation (September 6, 2013) at 12-13.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans. Moreover, the membership of OPAE includes a number of non-profit organizations with facilities receiving electric service from Duke.<sup>1</sup> Residential customers, including OPAE's low-income bill payment assistance and weatherization clients, may be affected by Duke's application. Non-residential customers, such as non-profit organizations, may also be affected. Therefore, OPAE has an interest in this proceeding.

OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding. Furthermore, other parties to the proceeding will not adequately represent the

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<sup>1</sup> OPAE's membership list can be found at: [www.ohiopartners.org](http://www.ohiopartners.org).

interests of OPAGE. The extensive background of OPAGE and its membership provides a unique and important viewpoint on matters at issue in this application.

Therefore, OPAGE is entitled to intervene in this proceeding with the full powers and rights granted specifically by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served electronically upon the following parties identified below in this case on this 25th day of February 2014.

/s/Colleen L. Mooney

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy