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### Via E-FILE

March 25, 2014

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case No. 14-322-EL-FOR

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

David F. Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Encl.

Cc:

Certificate of Service

# BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The 2014 Electric Long Term Forecast Report and Resource Plan Of Duke Energy Ohio

Case No. 14-322-EL-FOR

# THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

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March 25, 2014

COUNSEL FOR THE OHIO ENERGY GROUP

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The 2014 Electric Long Term Forecast

Report and Resource Plan Of Duke Energy Ohio

Case No. 14-322-EL-FOR

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility

Commission of Ohio should grant OEG leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and

gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who

are participating in this intervention are: AK Steel Corporation, Air Products and Chemicals, Inc., BP-Husky

Refining, LLC, E.I. DuPont de Nemours & Co., Ford Motor Company, GE Aviation, General Motors LLC and

Worthington Industries. These companies purchase electric distribution services from Duke Energy Ohio, Inc.

Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. OEG

intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly

delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio

Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

David F. Boehm, Esq.

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

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COUNSEL FOR THE OHIO ENERGY GROUP

March 24, 2014

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#### **CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 25<sup>th</sup> day of March, 2014 to the following:

David F. Boehm, Esq. Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

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Case No(s). 14-0322-EL-FOR

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. David F. Boehm on behalf of Ohio Energy Group