

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application of Duke	)	
Energy Ohio for Authority to Establish a	)	
Standard Service Offer Pursuant to Section	)	
4928.143, Revised Code, in the Form of an	)	Case No. 14-841-EL-SSO
Electric Security Plan, Accounting	)	
Modifications and Tariffs for Generation	)	
Service.	)	
	)	
In the Matter of the Application of Duke	)	
Energy Ohio for Authority to Amend its	)	Case No. 14-842-EL-ATA
Certified Supplier Tariff, P.U.C.O. No. 20.	)	

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**MOTION TO INTERVENE OF THE OMA**

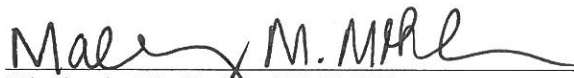
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Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, The Ohio Manufacturers' Association (OMA) hereby respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in the above-captioned matter with the full powers and rights granted to intervening parties.

As demonstrated further in the attached Memorandum in Support, OMA has a real and substantial interest in this proceeding, which may be adversely affected by the outcome of this proceeding and which cannot be adequately represented by any existing parties. Accordingly, OMA satisfies the standard for intervention set forth in the Commission's rules and by statute.

WHEREFORE, OMA respectfully requests that the Commission grant this motion for leave to intervene and that OMA be made a full party of record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mallory M. Mohler", is written over a horizontal line.

Kimberly W. Bojko (0069402)

Mallory M. Mohler (0089508)

Carpenter Lipps & Leland LLP

280 Plaza, Suite 1300

280 North High Street

Columbus, Ohio 43215

Telephone: (614) 365-4100

Email: [Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)

[Mohler@carpenterlipps.com](mailto:Mohler@carpenterlipps.com)

*Counsel for OMA*

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**MEMORANDUM IN SUPPORT**

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On May 29, 2014, Duke Energy Ohio, Inc. (Duke) filed an application to establish a standard service offer (SSO) in the form of an electric security plan (ESP). On the same date, Duke also filed an application to amend its Certified Supplied Tariff, P.U.C.O. No. 20.

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-captioned proceeding. Section 4903.221, Revised Code, provides, in part, that any person “who may be adversely affected” by a Commission proceeding is entitled to seek intervention in that proceeding. Section 4903.221(B), Revised Code, further requires the Commission to consider the nature and extent of the prospective intervenor’s interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor’s potential contribution to a just and expeditious resolution of the issues involved.

Rule 4901-1-11, Ohio Administrative Code, permits intervention to a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede his ability to protect that interest and whose interest is not adequately represented by an existing party.

The OMA is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. The OMA works directly with elected officials, regulatory agencies, the judiciary, and the media, to provide education and information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocating in critical cases before the Commission. OMA members purchase electric power services from Duke and will be affected by the Commission's determination in these matters.

Therefore, OMA has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMA is regularly and actively involved in Commission proceedings, and as in previous proceedings, OMA's unique knowledge and prospective will contribute to the full development and equitable resolution of the factual issues in this proceeding, and OMA's interest will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

OMA satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, and is, therefore, authorized to intervene with the full powers and rights granted by the Commission to intervening parties.

WHEREFORE, OMA respectfully requests that the Commission grant this motion for leave to intervene and that OMA be made a full party of record.

Respectfully submitted,

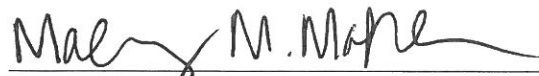
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Kimberly W. Bojko (0069402)  
Mallory M. Mohler (0089508)  
Carpenter Lipps & Leland LLP  
280 Plaza, Suite 1300  
280 North High Street  
Columbus, Ohio 43215  
Telephone: (614) 365-4100  
Email: Bojko@carpenterlipps.com  
Mohler@carpenterlipps.com

*Counsel for OMA*

## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on June 11, 2014.



Mallory M. Mohler

William Wright  
Attorney General's Office  
Public Utilities Commission of Ohio  
180 E. Broad Street, 6<sup>th</sup> Floor  
Columbus, OH 43215  
[William.wright@puc.state.oh.us](mailto:William.wright@puc.state.oh.us)

Amy B. Spiller, Counsel of Record  
Elizabeth H. Watts  
Rocco O. D'Ascenzo  
139 E. Fourth Street, 1303-Main  
P.O. Box 961  
Cincinnati, OH 45201-0960  
[Amy.Spiller@duke-energy.com](mailto:Amy.Spiller@duke-energy.com)  
[Elizabeth.watts@duke-energy.com](mailto:Elizabeth.watts@duke-energy.com)  
[Rocco.dascenzo@duke-energy.com](mailto:Rocco.dascenzo@duke-energy.com)

Counsel for Duke Energy-Ohio

David f. Boehm  
Michael L. Kurtz  
Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
[dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

Mark A. Hayden  
Jacob McDermott  
Scott J. Casto  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
[haydenm@firstenergycorp.com](mailto:haydenm@firstenergycorp.com)  
[jmcdermott@firstenergycorp.com](mailto:jmcdermott@firstenergycorp.com)  
[scasto@firstenergycorp.com](mailto:scasto@firstenergycorp.com)

Counsel for the Ohio Energy Group

Counsel for FirstEnergy Solutions Corp.

Kevin R. Schmidt  
88 East Broad Street, Suite 1770  
Columbus, OH 43215  
[Schmidt@sppgrp.com](mailto:Schmidt@sppgrp.com)

Maureen R. Grady, Counsel of Record  
Joseph P. Serio  
Edmund "Tad" Berger  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215-3485  
[Maureen.grady@occ.ohio.gov](mailto:Maureen.grady@occ.ohio.gov)  
[Joseph.serio@occ.ohio.gov](mailto:Joseph.serio@occ.ohio.gov)  
[Edmund.berger@occ.ohio.gov](mailto:Edmund.berger@occ.ohio.gov)

Counsel for the Energy Professionals of Ohio

Judi L. Sobecki  
The Dayton Power and Light Company  
1065 Woodman Drive  
Dayton, OH 45432  
[judi.sobecki@aes.com](mailto:judi.sobecki@aes.com)

Attorney for the Dayton Power and Light  
Company

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Summary: Motion To Intervene Of The OMA electronically filed by Mrs. Kimberly W. Bojko on behalf of Ohio Manufacturers' Association