

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

Now comes the University of Cincinnati (“UC”), who, pursuant to Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, moves for intervention in the above styled proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

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

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**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE OF
THE UNIVERSITY OF CINCINNATI**

Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, establish the standard for intervention in the above-styled proceeding as a full party of record.

Rule 4901-1-11 of the Ohio Administrative Code states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

In addition to establishment of a direct interest, the factors that the Public Utilities Commission of Ohio (the "Commission") considers in implementing the above rule are the nature of the intervenor's interest, the extent that interest is represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. (See also R.C. 4903.221(B) upon which the above rule is authorized).

The University of Cincinnati is a state supported institution of higher learning and is located in Cincinnati, Ohio. UC is an electric customer of Duke and has its own significant amount of generation.

On May 29, 2014, Duke Energy Ohio, Inc. ("Duke") filed an application for a Standard Service Offer ("SSO") pursuant to Section 4928.141, Revised Code. Duke's current Electric Security Plan will expire on May 31, 2015. Duke is proposing an Electric Security Plan that is intended to last until May 31, 2018. UC has a real and substantial interest in this case as a result of being a customer of Duke and having substantial amounts of its own generation.

This motion for intervention precedes the July 8, 2014 deadline established by the Attorney Examiner's Entry of June 6, 2014. The motion is also being filed more than five days before the hearing deadline established in Rule 4901-1-29. Thus, the intervention is timely and should not unduly delay the instant proceedings.

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

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing documents was served this 3rd day of July, 2014 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.



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Summary: Motion Motion for Leave to Intervene electronically filed by M HOWARD
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