

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
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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 Miami University (“Miami”), 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.

Respectfully Submitted,

M. H. B. 1894

Attorneys for Miami University

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

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).

Miami University is a state supported institution of higher learning and is located in Oxford, Ohio. Miami is an electric service 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. Miami 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, Miami University respectfully requests that the Commission grant this motion for leave to intervene and that it be made a full party of record.

Respectfully Submitted,

Mike DeWine
Attorney General

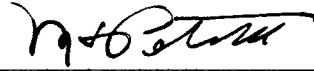


M. Howard Petricoff (0008287)
Special Assistant Attorney General
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
Tel. (614) 464-5414
Fax (614) 719-4904
mhpetricoff@vorys.com

Attorneys for Miami University

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing documents was served this 7th day of July, 2014 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.



M. Howard Petricoff

Duke Energy Ohio, Inc.

Amy B. Spiller
Rocco O. D'Ascenzo
Jeanne W. Kingery
Elizabeth H. Watts
139 E. Fourth Street, 1303-Main
P.O. Box 961
Cincinnati, OH 45201-0960
Amy.spiller@duke-energy.com
Rocco.DAscenzo@duke-energy.com
Elizabeth.watts@duke-energy.com
Jeanne.kingery@duke-energy.com

Ohio Energy Group

Michael L. Kurtz, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@BKLLawfirm.com
mkurtz@BKLLawfirm.com
jkylercohn@BKLLawfirm.com

Ohio Manufacturers' Association

Kimberly W. Bojko
Mallory M. Mohler
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus OH 43215
bojko@carpenterlipps.com
mohler@carpenterlipps.com

Office of the Ohio Consumers' Counsel

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

IGS Energy

Joseph Olikier
Matthew White
6100 Emerald Parkway
Dublin, Ohio 43016
joliker@igsenergy.com
mwhite@igsenergy.com

FirstEnergy Solutions Corp.

Mark A. Hayden
Jacob A. McDermott
Scott J. Casto
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308
haydenm@firstenergycorp.com
jmcdermott@firstenergycorp.com
scasto@firstenergycorp.com

The Energy Professionals of Ohio

Kevin R. Schmidt
88 East Broad Street, Suite 1770
Columbus, OH 43215
Schmidt@sppgrp.com

Direct Energy Services, LLC and Direct Energy Business, LLC

Joseph M. Clark
21 East State Street, 19th Floor
Columbus, Ohio 43215
(614) 220-4369 Ext 232
joseph.clark@directenergy.com

Industrial Energy Users-Ohio

Samuel C. Randazzo
Frank P. Darr
Matthew R. Pritchard
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

People Working Cooperatively, Inc.

Andrew J. Sonderman
Margeaux Kimbrough
Kegler Brown Hill & Ritter LPA
65 East State Street
Columbus, Ohio 43215-4294
asonderman@keglerbrown.com
mkinbrough@keglerbrown.com

Ohio Environmental Council

Trent Dougherty
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212-3449
tdougherty@theOEC.org

The Dayton Power and Light Company

Judi L. Sobecki
1065 Woodman Drive
Dayton, OH 45432
judi.sobecki@aes.com

Ohio Partners for Affordable Energy

Colleen L. Mooney
Cathryn N. Loucas
231 West Lima Street
Findlay, OH 45839-1793
cmooney@ohiopartners.org
cloMiami@ohiopartners.org

Ohio Power Company

Steven T. Nourse
Matthew J. Satterwhite
Yazen Alami
American Electric Power Service Corporation
1 Riverside Plaza 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
mjsatterwhite@aep.com
yalami@aep.com

Sierra Club

Christopher J. Allwein
Todd M. Williams
Williams Allwein and Moser, LLC
1500 West Third Ave, Suite 330
Columbus, Ohio 43212
callwein@wamenergylaw.com
toddm@wamenergylaw.com

The Greater Cincinnati Health Council

Douglas E. Hart
441 Vine Street, Suite 4192
Cincinnati, OH 45202
dhart@douglasshart.com

The Kroger Company
Rebecca L. Hussey
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus OH 43215
hussey@carpenterlipps.com

Staff of the Public Utilities Commission of Ohio
Steven Beeler
Thomas Lindgren
Ryan O'Rourke
Attorney General's Section
Public Utilities Commission of Ohio
180 E. Broad St., 6th Floor
Columbus, OH 43215
steven.beeler@pMiami.state.oh.us
thomas.lindgren@pMiami.state.oh.us
ryan.orourke@pMiami.state.oh.us

Constellation NewEnergy Inc. and Exelon Generation Company LLC
David I. Fein
Exelon Corporation
10 South Dearborn Street, 47th Floor
Chicago, IL 60603
david.fein@exeloncorp.com

Attorney Examiner for the Public Utilities Commission of Ohio
Christine M.T. Pirik
180 E. Broad St., 6th Floor
Columbus, OH 43215
christine.pirik@pMiami.state.oh.us

Cynthia Fonner Brady
Exelon Business Services Company
4300 Winfield Road
Warrenville, IL 60555
cynthia.brady@constellation.com

Lael Campbell
Exelon
101 Constitution Avenue, NW
Washington, DC 20001
Lael.Campbell@constellation.com

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Summary: Motion Motion for Leave to Intervene of Miami University electronically filed by M
HOWARD PETRICOFF on behalf of Miami University