

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke	)	
Energy Ohio, Inc. for Recovery of Program	)	
Costs, Lost Distribution Revenue, and	)	
Performance Incentives Relate to its Energy	)	Case No. 15-534-EL-RDR
Efficiency and Demand Response Programs	)	
for 2014.	)	

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**MOTION TO INTERVENE OF  
THE OHIO MANUFACTURERS' ASSOCIATION**

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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,

/s/ Kimberly W. Bojko

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**MEMORANDUM IN SUPPORT**

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On March 30, 2015, Duke Energy Ohio, Inc. (Duke or the Company) filed an application for recovery of its 2014 program costs, lost distribution revenue, and performance incentives related to its energy efficiency and demand response programs.

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.

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. 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; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. OMA members purchase electric power services from Duke, are responsible for program costs, lost distribution revenue, and performance incentives related to Duke's energy efficiency and demand response programs, and will be affected by the Commission's determination in these matters. OMA has further participated in past years' proceedings on these issues and has a continuing interest in ensuring that its members' interests are reflected and considered by the Commission in the above-captioned matter.

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 perspective will contribute to the full development and equitable resolution of the factual issues in this proceeding. Further, 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,

/s/ Kimberly W. Bojko  
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**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 15, 2015.

/s/ Kimberly W. Bojko

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