

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application)	
of Duke Energy Ohio, Inc., to)	Case No. 15-883-GE-RDR
Adjust Rider DR-IM and Rider)	
AU for 2014 Grid)	
Modernization Costs.)	

**MOTION TO INTERVENE
BY
OHIO PARTNERS FOR AFFORDABLE ENERGY**

Ohio Partners for Affordable Energy ("OPAE") respectfully moves to intervene in this proceeding before the Public Utilities Commission of Ohio ("Commission") regarding the application filed by Duke Energy Ohio, Inc., ("Duke") to adjust Duke's Riders DR-IM and AU for recovery of 2014 Grid Modernization costs. The reasons the Commission should grant this motion to intervene are further set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/Colleen L. Mooney
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MEMORANDUM IN SUPPORT

Ohio Partners for Affordable Energy (“OPAE”) requests permission to intervene in this matter pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules contained in Section 4901-1-11 of the Ohio Administrative Code. The Commission, in ruling upon a motion to intervene in its proceedings, shall consider the following criteria:

- (1) The nature and extent of the intervenor’s interest.
- (2) The legal position advanced by the prospective intervenor and its probable relationship to the merits of the case.
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding.
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

Duke’s application proposes to collect \$6.14 per month from each residential electric customer under Rider DR-IM and generally \$1.22 per month from each residential gas customer under Rider AU. As an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans, OPAE has a real and substantial interest in this proceeding. Residential customers, including OPAE’s low-income bill

payment assistance and weatherization clients, will be affected by Duke's application.

Moreover, the membership of OPAE includes a number of non-profit organizations with facilities receiving electric and gas service from Duke.¹ Non-residential customers, such as OPAE's non-profit organizations, will also be affected by Duke's application. Therefore, OPAE has an interest in this proceeding.

OPAE has been an intervenor in Duke's previous annual applications to recover the costs of its Smart Grid and Grid Modernization programs. OPAE also has an interest in the identification and recognition of customer benefits that could be realized from the grid modification programs.

OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding. Furthermore, other parties to the proceeding will not adequately represent the interests of OPAE. The extensive background of OPAE and its membership provides a unique and important viewpoint on matters at issue in this docket.

Therefore, OPAE is entitled to intervene in this proceeding with the full powers and rights granted specifically by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

¹ OPAE's membership list can be found at: www.ohiopartners.org.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene and Memorandum in support was served on the persons stated below via electronic transmission this 25th day of June 2015.

/s/Colleen L. Mooney

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy