

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Authority to Establish)	
a Standard Service Offer Pursuant to Section)	
4923.143, Revised Code, in the Form of an)	Case No. 17-1263-EL-SSO
Electric Security Plan, Account)	
Modifications, and Tariffs for Generation)	
Service.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Authority to Amend its)	Case No. 17-1264-EL-ATA
Certified Supplier Tariff, P.U.C.O. No. 20.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Authority to Defer)	Case No. 17-1265-EL-AAM
Vegetation Management Costs.)	

**MOTION TO INTERVENE OF
RETAIL ENERGY SUPPLY ASSOCIATION**

In accordance with R.C. 4903.221 and Ohio Adm. Code 4901-1-11, the Retail Energy Supply Association (RESA) respectfully requests issuance of an order granting intervention in this proceeding. A Memorandum in Support follows.

Respectfully submitted,

/s/ Mark A. Whitt

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ATTORNEYS FOR RETAIL ENERGY
SUPPLY ASSOCIATION

MEMORANDUM IN SUPPORT

R.C. 4903.221 confers a right to intervene to any person who may be “adversely affected” by a Commission proceeding. In considering a request to intervene, the Commission must consider 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, and whether intervention would unduly delay the proceeding. *See* R.C. 4903.221(B)(1-4). *See also* Ohio Admin. Code 4901-1-11.

RESA meets all of the criteria for intervention. RESA is a non-profit 501(c)(6) organization headquartered in Harrisburg, Pennsylvania. Its member companies supply retail electricity and natural gas to residential, commercial, industrial, and governmental customers throughout the United States. In Ohio, RESA members serve customers throughout the state, including the service territory of Duke Energy Ohio, Inc. (Duke).¹ RESA is and has historically been active in many electric industry proceedings at the Commission since its inception.

RESA’s Ohio members have existing and potential business interests in Duke’s service territory that will be affected by the outcome of this proceeding. These interests cannot be adequately represented by other parties. The Commission’s decision in this matter will affect the viability of the competitive retail electric market in Duke’s service territory, where RESA members provide electric power and other products and services to retail customers. The Commission has granted intervention to RESA in previous ESP proceedings. *See, e.g.,* Case Nos.

¹ RESA’s Ohio members are AEP Energy, APG&E, Calpine Energy Solutions, Champion Energy Services LLC, Constellation NewEnergy Inc, Crius, Direct Energy Services LLC, Dynegy, ENGIE Resources, Entrust Energy, IGS Energy, Just Energy, Liberty Power, NextEra Energy Services, Nordic Energy Services, LLC, NRG Energy Inc., Source Energy, Spark Energy, and Starion Energy.

16-1852-EL-SSO, 16-0395-EL-SSO, 14-1297-EL-SSO, 14-0841-EL-SSO, 13-2385-EL-SSO.

The factors that warranted intervention in those proceedings are also present here.

RESA's participation in this proceeding will contribute to a just resolution of the issues affecting its members, and will not unduly prolong or delay the proceeding.

Accordingly, RESA respectfully requests that the Commission grant this Motion to Intervene and that it be made a full party of record.

Dated: September 6, 2017

Respectfully submitted,

/s/ Mark A. Whitt

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ATTORNEYS FOR RETAIL ENERGY
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in

Support was served by electronic mail this 6th day of September, 2017 to the following:

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One of the Attorneys for Retail Energy Supply
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Case No(s). 17-1263-EL-SSO, 17-1264-EL-ATA, 17-1265-EL-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Ms. Rebekah J. Glover on behalf of Retail Energy Supply Association