BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW 36 EAST SEVENTH STREET SUITE 1510 CINCINNATI, OHIO 45202 TELEPHONE (513) 421-2255

TELECOPIER (513) 421-2764

Via E-FILE

August 8, 2018

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case No. 18-1185-EL-UNC and 18-1186-EL-ATA

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew Encl.

Cc: Certificate of Service

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Duke Energy Ohio, Inc., For Implementation of the Tax Cuts and Jobs Act of 2017

Case No. 18-1185-EL-UNC

:

:

In The Matter Of The Application Of Duke Energy Ohio, Inc., For Approval of Tariff Amendments.

Case No. 18-1186-EL-ATA

:

THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: <u>mkurtz@BKLlawfirm.com</u> jkylercohn@BKLlawfirm.com

August 8, 2018

COUNSEL FOR THE OHIO ENERGY GROUP

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Duke Energy Ohio,

Case No. 18-1185-EL-UNC

Inc., For Implementation of the Tax Cuts and Jobs Act of 2017

:

In The Matter Of The Application Of Duke Energy Ohio,

Case No. 18-1186-EL-ATA

Inc., For Approval of Tariff Amendments.

:

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio should grant OEG leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: AK Steel Corporation, Air Products and Chemicals, Inc., Ford Motor Company, GE Aviation, General Motors LLC, Greif Packaging, LLC, MillerCoors LLC and Worthington Industries. These companies purchase electric distribution services from Duke Energy Ohio, Inc. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLlawfirm.com jkylercohn@BKLlawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the **g**th day of August, 2018 to the following:

Michael L. Kurtz, Esq. Jody Kyler Cohn, Esq.

*WHITFIELD, ANGELA MRS.
CARPENTER LIPPS & LELAND LLP
280 NORTH HIGH STREET, SUITE 1300
COLUMBUS OH 43215

*BINGHAM, DEB J. MS.
OFFICE OF THE OHIO CONSUMERS' COUNSEL
65 EAST STATE STREET, 7TH FLOOR
COLUMBUS OH 43215-4203

*DARR, FRANK P MR.
MCNEES, WALLACE & NURICK
21 E. STATE STREET 17TH FLOOR
COLUMBUS OH 43215

*BOJKO, KIMBERLY W. MRS.
CARPENTER LIPPS & LELAND LLP
280 NORTH HIGH STREET 280 PLAZA SUITE 1300
COLUMBUS OH 43215

OHIO CONSUMERS' COUNSEL CHRISTOPHER HEALY 65 EAST STATE STREET 7TH FLOOR COLUMBUS OH 43215-4203 *FRISCH, ADELE M. MRS. DUKE ENERGY 139 EAST FOURTH STREET CINCINNATI OH 45202 This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 18-1185-EL-UNC, 18-1186-EL-ATA

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group