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Via E-FILE

April 17, 2020

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

In re: Case No. 20-0856-EL-AEC and 20-0857-EL-RDR

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP's (OEG) MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced docket(s).

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

Respectfully yours,

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.
Kurt J. Boehm, 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.,	:	Case No. 20-0856-EL-AEC
Under the Commission's Proceedings During the Declared State	:	
of Emergency, for a Reasonable Arrangement with Customers	:	
Served Under Rates DS, DP, and TS.	:	
	:	
In the Matter of the Application of Duke Energy Ohio to Modify	:	Case No. 20-0857-EL-RDR
its Economic Competitiveness Fund Rider and Request for	:	
Waivers.	:	

**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,

/s/ Michael L. Kurtz
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April 17, 2020

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc.,	:	Case No. 20-0856-EL-AEC
Under the Commission’s Proceedings During the Declared State	:	
of Emergency, for a Reasonable Arrangement with Customers	:	
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	:	
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its Economic Competitiveness Fund Rider and Request for	:	
Waivers.	:	

**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., BP-Husky Refining, LLC, Ford Motor Company, GE Aviation, General Motors LLC, Greif, Inc., Miller Coors 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,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

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April 17, 2020

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 17th day of April, 2020 to the following:

/s/ Michael L. Kurtz

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in

Case No(s). 20-0856-EL-AEC, 20-0857-EL-RDR

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