

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates	:	Case No. 21-887-EL-AIR
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In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval	:	Case No. 21-888-EL-ATA
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	:	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods	:	Case No. 21-889-EL-AAM
	:	

**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

Michael L. Kurtz, Esq.

Kurt J. Boehm, 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@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

September 20, 2021

COUNSEL FOR THE OHIO ENERGY GROUP

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**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: Cleveland-Cliffs Steel Corporation (fka AK Steel), Air Products and Chemicals, Inc., Ford Motor Company, GE Aviation, General Motors LLC, Greif, Inc., Molson Coors Beverage Company 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.

Kurt J. Boehm, 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@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

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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 20th day of September, 2021 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

DUKE ENERGY OHIO
AMY B SPILLER
139 E 4TH STREET, ROOM 1409-M
CINCINNATI OH 45202

*MEYER, TAMMY M. MRS.
DUKE ENERGY
139 EAST 4TH STREET 12TH FLOOR
CINCINNATI OH 45202

D'ASCENZO, ROCCO, ESQ.
DUKE ENERGY OHIO
139 EAST 4TH STREET 12TH FLOOR
CINCINNATI OH 45202

*BOSSART, BARBARA J MRS.
PUCO
180 E. BOARD STREET
COLUMBUS OH 43215

*KINGERY, JEANNE W
DUKE ENERGY OHIO INC
139 E FOURTH ST 1303 MAIN
COLUMBUS OH 43215

VAYSMAN, LARISA
DUKE ENERGY OHIO INC
139 EAST FOURTH STREET, ML 1303
CINCINNATI OH 45202

BRAMA, ELIZABETH M
TAFT STETTINIUS & HOLLISTER LLP
2200 IDS CENTER
80 SOUTH EIGHTH STREET
MINNEAPOLIS MN 55402

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Case No(s). 21-0887-EL-AIR, 21-0888-EL-ATA, 21-0889-EL-AAM

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