

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke )	
Energy Ohio, Inc., for an Increase in Electric )	Case No. 21-0887-EL-AIR
Distribution Rates. )	

In the Matter of the Application of Duke )	
Energy Ohio, Inc., for Tariff Approval. )	Case No. 21-0888-EL-ATA
)	

In the Matter of the Application of Duke )	
Energy Ohio, Inc., for Approval to Change )	Case No. 21-0889-EL-AAM
Accounting Methods. )	

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**MOTION TO INTERVENE OF  
ONE ENERGY ENTERPRISES LLC**

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Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“OAC”) Rule 4901-1-11, One Energy Enterprises LLC (“One Energy”) moves to intervene in the above-captioned proceedings. As set forth in more detail in the attached Memorandum in Support, One Energy requests that the Public Utilities Commission of Ohio (the “Commission”) grant One Energy’s Motion because it has a real and substantial interest in these proceedings, the Commission’s disposition of these proceedings may impair or impede One Energy’s ability to protect that interest, and One Energy’s participation will not cause undue delay.

Respectfully submitted on behalf of  
ONE ENERGY ENTERPRISES, LLC

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates.	)	Case No. 21-0887-EL-AIR
	)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.	)	Case No. 21-0888-EL-ATA
	)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.	)	Case No. 21-0889-EL-AAM
	)	

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**MEMORANDUM IN SUPPORT**

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One Energy helps large energy users build modern, tailored, on-site power facilities. In doing so, One Energy is decarbonizing manufacturing and enabling customer control. As a vertically integrated enterprise, One Energy provides physical solutions including Wind for Industry® and ManagedHV™, as well as analytics and commercial offerings to enable end users to fully customize their energy experience. Everyday items are being produced cleaner and more sustainably thanks to Wind for Industry® projects – from dishwashers, sliced turkey products, and soda cans, to cement and plastic products. Founded in 2009, One Energy is the largest installer and owner of behind-the-meter wind energy in the United States.

On October 1, 2021, Duke Energy Ohio, Inc. filed an application to increase its electric distribution rates, which could ultimately affect One Energy and its net metering customers. To date, no procedural schedule has been set and there is not yet a deadline for interventions. Therefore, this motion to intervene is timely.

One Energy will be affected by the Commission’s determination in these matters and should be permitted to intervene because it has a real and substantial interest in these proceedings. One Energy continues to be involved in efforts at the Commission, and through its work with all of Ohio’s electric

distribution utilities, to promote fair and non-discriminatory practices and policies for behind-the-meter projects in Ohio, while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of the matters in these proceedings does not have a negative impact on industrial and manufacturing customers with behind-the-meter generation, or those installing behind-the-meter generation in Ohio, and spurs investment in distributed generation resources. One Energy's substantial interest in these proceedings is not adequately addressed by any other party. And, its participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to those who have installed or are installing behind-the-meter generation in Ohio.

Accordingly, One Energy respectfully requests the Commission determine that One Energy has a real and substantial interest in these proceedings and grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC 4901-1-11.

Respectfully submitted on behalf of  
ONE ENERGY ENTERPRISES, LLC

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### **CERTIFICATE OF SERVICE**

In accordance with O.A.C. 4901-1-05, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 27<sup>th</sup> day of October 2021.

/s/ Matthew W. Warnock  
Matthew W. Warnock

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

Summary: Text Motion to Intervene of One Energy Enterprises LLC electronically  
filed by Ms. Megan Zemke on behalf of Warnock, Matthew W. Mr.