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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Application of The Cincinnati Gas & Electric Company to Modify its Non-Residential Generation Rates To Provide For Market-Based Standard Service Offer Pricing and To Establish an Alternative Competitively-Bid Service Rate Option Subsequent to the Market Development Period.) Case No. 03-93-EL-ATA

In the Matter of the Application of The Cincinnati Gas & Electric Company for Authority to Modify Current Accounting Procedures for Certain Costs Associated with the Midwest Independent Transmission System Operator.) Case No. 03-2079-EL-AAM

In the Matter of the Application of The Cincinnati Gas & Electric Company for Authority to Modify Current Accounting Procedures for Capital Investment in its Electric Transmission and Distribution System and to Establish a Capital Investment Reliability Rider to be Effective after The Market Development Period.) Case No. 03-2081-EL-AAM) Case No. 03-2080-EL-ATA

MOTION TO INTERVENE BY
PEOPLE WORKING COOPERATIVELY, INC.

People Working Cooperatively, Inc. ("PWC") respectfully requests that the Public Utilities Commission of Ohio ("Commission") grant its motion requesting intervention in the above-named matters for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted on behalf of
PEOPLE WORKING COOPERATIVELY, INC.

Mary W Christensen
Mary W Christensen (0024452)
Christensen & Christensen
401 North Front Street Suite 350
Columbus OH 43215-2499

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**MEMORANDUM IN SUPPORT OF
MOTION TO INTERVENE BY PWC**

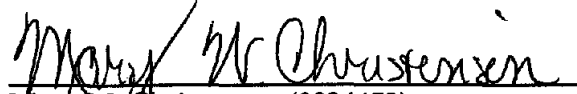
PWC is a small, non-profit organization that has served consumers in the Cincinnati Gas & Electric Company ("CG&E") service territory by providing weatherization and energy management services to consumers of services provided by CG&E. While a small organization, it is the largest provider of these services in CG&E's service territory. PWC's mission is to provide essential repairs and services so that homeowners can remain in their homes, living independently in a safe and sound environment. PWC was granted intervention and participated in CG&E's electric transition plan proceeding and related cases, PUCO Case Nos. 99-1658-EL-ETP, and related dockets.

PWC meets the standards set forth in both the statute and the rules for intervention in this matter. It is, as described in Ohio Revised Code ("R.C.") Section 4903.221, a "person who may be adversely affected" by this proceeding insofar as any outcome in this proceeding may directly and indirectly affect funds available for and consumers' ability to enjoy the services PWC provides to consumers. CG&E's proposal in this matter provides for continued funding of weatherization and energy efficiency services through 2008, a portion of which is used for funding to PWC projects under contracts with CG&E. And to protect its "interest," R.C. Section 4903.221 (B)(1), in the funding of and its providing weatherization and energy efficiency services to its clients, it should be allowed to participate as the Commission considers CG&E's request. There is no other party in this proceeding whose interest in the continuation of funding of the weatherization and energy management services is as substantial as it is for PWC, and its participation will not unduly delay the proceedings, R.C. Section 4903.221 (B)(3).

Insofar as PWC's intervention meets the criteria of Section 4903.221, it satisfies the standards set forth in the PUCO's rule for intervention contained in Ohio Administrative Code Section 4901-1-11, including that its motion is timely and is made

by a person with a real and substantial interest in the outcome of this proceeding. For the foregoing reasons, PWC requests that the Commission grant its request to intervene.

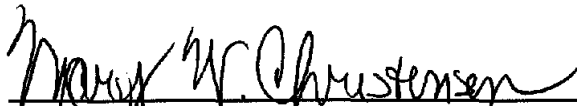
Respectfully submitted on behalf of
PEOPLE WORKING TOGETHER, INC.



Mary W. Christensen (0024452)
Christensen & Christensen
401 North Front Street Suite 350
Columbus OH 43215-2499

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Intervene and Memorandum in Support of People Working Cooperatively, Inc. has been served on the following parties of record in this proceeding by first-class, postage prepaid U.S. mail on this 9th day of March, 2004.



Mary W. Christensen

THOMAS W. MCNAMEE, ESQ.
ASSISTANT ATTORNEY GENERAL
PUBLIC UTILITIES SECTION
180 EAST BROAD STREET
COLUMBUS OH 43266-0573

PAUL COLBERT, ESQ.
CINERGY CORPORATION
155 EAST BROAD STREET
COLUMBUS OH 43215

W. JONATHAN AIREY, ESQ.
VORYS SATER SEYMOUR & PEASE LLP
52 EAST GAY STREET PO BOX 1008
COLUMBUS OH 43216-1008

ANN M. HOTZ
OFFICE OF CONSUMERS' COUNSEL
10 WEST BROAD STREET STE 1800
COLUMBUS OH 43215

JAMES H. BOLIN, JR., ESQ.
CINERGY SERVICES, INC.
139 EAST FOURTH STREET
CINCINNATI OH 45201-0960

CRAIG G. GOODMAN, ESQ.
NAT'L ENERGY MARKETERS ASSOC.
3333 K STREET, NW, STE 110
WASHINGTON DC 20007

DONALD I. MARSHALL, PRESIDENT
EAGLE ENERGY LLC
4925 CLEVES-WARSAW PIKE
CINCINNATI OH 45238

DAVID F. BOEHM, ESQ.
MICHAEL L. KURTZ, ESQ.
BOEHM KURTZ & LOWRY
36 EAST SEVENTH ST. STE 2110
CINCINNATI OH 45202

SAMUEL C. RANDAZZO, ESQ.
LISA G. MCALISTER, ESQ.
DANIEL J. NEILSEN, ESQ.
MCNEES WALLACE & NURICK LLC
21 EAST STATE STREET 17TH FLOOR
COLUMBUS OH 43215

M. HOWARD PETRICOFF, ESQ.
STEPHEN M. HOWARD, ESQ.
VORYS SATER SEYMOUR & PEASE LLP
52 EAST GAY STREET PO BOX 1008
COLUMBUS OH 43216-1008

BENITA KAHN, ESQ.
VORYS SATER SEYMOUR & PEASE LLP
52 EAST GAY STREET PO BOX 1008
COLUMBUS OH 43216-1008

ATHAN A. VINOLUS, ESQ.
THE DAYTON POWER & LIGHT CO.
1065 WOODMAN DRIVE
DAYTON OH 45432

DAVID C. RINEBOLT, ESQ.
OHIO PARTNERS FOR AFFORDABLE
ENERGY
337 S. MAIN ST. 4TH FL. STE 5
PO BOX 1793
FINDLAY OH 45839-1793

RICHARD L. SITES, ESQ.
OHIO HOSPITAL ASSOCIATION
155 EAST BROAD STREET 15TH FLOOR
COLUMBUS OH 43215-3620

DANE STINSON, ESQ.
WILLIAM A. ADAMS, ESQ.
BAILEY CAVALIERI LLC
10 WEST BROAD STREET STE 2100
COLUMBUS OH 43215-3422

JANINE MIGDEN, ESQ.
HAHN LOESER & PARKS
1050 FIFTH THIRD CENTER
21 EAST STATE STREET
COLUMBUS OH 43215

BARTH ROYER, ESQ.
JUDITH B. SANDERS, ESQ.
BELL ROYER & SANDERS CO. LPA
33 SOUTH GRANT AVENUE
COLUMBUS OH 43215

SHAWN P. LEYDEN, ESQ.
PSEG ENERGY RESOURCES & TRADE
LLC
80 PARK PLAZA 19TH FLOOR
NEWARK NJ 07102

SALLY W. BLOOMFIELD, ESQ.
THOMAS J. O'BRIEN, ESQ.
BRICKER & ECKLER
100 SOUTH THIRD STREET
COLUMBUS, OH 43215