

FILE

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
The Cincinnati Gas & Electric Company to) Case No. 05-725-EL-UNC
Modify its Quarterly Fuel and Purchase)
Power Component of its Market Based)
Standard Service Offer.)

In the Matter of the Application of) Case No. 05-724-EL-UNC
The Cincinnati Gas & Electric Company to)
Adjust and Set its System Reliability Tracker)
Market Price)

In the Matter of the Application of)
Duke Energy Ohio, Inc. to Modify its) Case No. 06-1068-EL-UNC
Quarterly Fuel and Purchase Power)
Component of its Market Based)
Standard Service Offer)

In the Matter of the Application of)
Duke Energy Ohio, Inc. to Adjust and Set its) Case No. 06-1069-EL-UNC
System Reliability Tracker)

DE-OHIO'S MOTION TO CONSOLIDATE CASES

Now comes Duke Energy Ohio, Inc (DE-Ohio) and hereby respectfully requests the consolidation of Case No. 06-1069 EL-UNC and Case No. 06-1069-EL-UNC with Case No.'s 05-725-EL-UNC and 05-724 EL-UNC. The aforementioned cases are interrelated, and will require identical testimony and will require DE-Ohio to submit identical supporting data. The consolidation of the cases will provide a more efficient and less confusing docket.

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For the foregoing reasons, as well as the reasons more fully explained in the accompanying Memorandum in Support, the Commission should grant DE-Ohio's Motion to Consolidate the Cases.

MEMORANDUM IN SUPPORT

On June 1, 2005, D-E-Ohio filed an application in Case No. 05-725-EL-UNC, proposing to establish its Fuel and Economy Purchased Power price component (Rider FPP) of DE-Ohio Market Based Standard Service Offer (MBSSO) for the period July 1, 2005 through September 30, 2005. On or about June 29, 2005, the Commission issued its Entry, which among other things, set forth a schedule for DE-Ohio to file future quarterly FPP prices and annual applications for review and approval by September 1, of each year.¹

In the aforementioned Entry, the Commission directed DE-Ohio to include the quarterly filings for the periods spanning October 1, 2005 through June 30, 2006, in its annual application in Case No. 05-725-EL-UNC, which the company was also directed to file by September 1, 2006. On August 9, 2006, the Commission issued its Entry in Case No's 05-724-EL-UNC and 05-725-EL-UNC directing the company to include the prudence review of the Company's System Reliability Tracker (Rider SRT) with its annual FPP filing covering the same quarterly periods.²

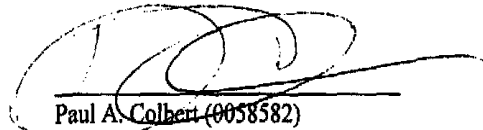
Coincident with the annual filing of DE-Ohio's Rider FPP and now Rider SRT review in case numbers 05-725-EL-UNC, and 05-724-EL-UNC respectively, DE-Ohio is

¹ In re. The Regulation of DE-Ohio's FPP, Case No. 05-725-EL-UNC, (Entry at 2-3) (June 29, 2005).

² In re. The Regulation of DE-Ohio's FPP, Case No. 05-725-EL-UNC, (Entry at 2-3) (August 9, 2006).

also making the initial filing for the company's Rider SRT prudence review for the quarterly periods beginning July 1, 2006 through June 30, 2007. The supporting data and testimony to be presented in the 05-725/ 05-724 Cases, is relevant and overlapping with the information to be presented in the 06-1068-EL-UNC and 06-1069-EL-UNC cases. Therefore, in the interest of efficiency, elimination of redundancy, and to lessen the confusion created in the maintenance of concurrent and identical cases, DE-Ohio respectfully requests that the Commission consolidate cases 05-725-EL-UNC, 05-724-EL-UNC, and 06-1069-EL-UNC.

Respectfully submitted,



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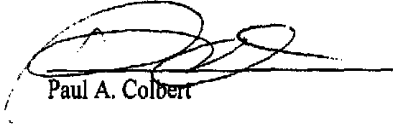
CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Consolidate was served via ordinary mail on the following parties this 1st day of September 2006.

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