

FILE

RECEIVED-DOCKETING DIV

BEFORE

2002 FEB -8 PM 1:41

THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

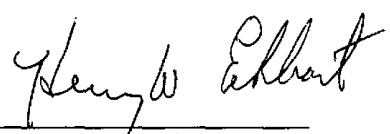
In the matter of the Application of The)
Cincinnati Gas & Electric Company for an) Case No. 01-1'228-GA-AIR
Increase in Gas Rates in its Service Area.)

In the Matter of the Application of The)
Cincinnati Gas & electric Company for) Case No. 01-1478-GA-ALT
Approval of an alternative Rate Plan for)
its Gas Distribution Service.)

MOTION OF PEOPLE WORKING COOPERATIVELY, INC.
TO INTERVENE, AND MEMORANDUM IN SUPPORT
OF MOTION

People Working Cooperatively, Inc. ("PWC") hereby respectfully moves the Commission for an Order granting it leave to intervene in the above captioned cases pursuant to R.C. 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, for the reasons set forth in the following Memorandum of Support.

Respectfully submitted,



Henry W. Eckhart (0020202)

50 West Broad Street, #2117
Columbus, Ohio 43215
Phone: (614) 461-0984
Fax: (614) 221-7401
E-mail: henryeckhart@aol.com

Counsel for People Working
Cooperatively, Inc.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
Technician ADP Date Processed 2/8/02

MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

In support of its Motion to Intervene People Working Cooperatively, Inc., ("PWC") states that it is an Ohio corporation not-for-profit which has contracted with Cincinnati Gas & Electric Company ("CG&E") for over fifteen (15) years to provide energy saving measurement installations and energy education for low-income customers of CG&E. During that time PWC has performed over 50,000 repairs. Weatherization services alone exceed 13,000 customers.

PWC also performs all necessary health and safety tests during the installation process to insure the health and safety of the residents that receive its services. The program is designed to assist the CG&E gas customers with the biggest need to get energy savings.

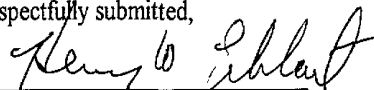
PWC currently has several contracts with CG&E and wants to assure itself that nothing in either of the subject cases in any way negatively impacts those contracts.

PWC has had a constructive relationship with CG&E and has performed the required services in its contracts in a professional and constructive manner.

PWC has a real and substantial interest in this case that is not specifically represented by any other party. The PWC participation will contribute to the just resolution of the issues involved in these proceedings. No party will be unjustly prejudiced by the PWC intervention.

WHEREFORE, People Working Cooperatively, Inc., respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,


Henry W. Eckhart (0020202)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing Motion to Intervene and the Memorandum in Support on the following parties on February 8, 2002, by first class mail, as listed on the Commission's list of the Parties of Record as of January 30, 2002:

John J. Finnigan, Jr.
Cinergy Corp
139 East Fourth St., P O Box 960
Cincinnati Oh 45201

Noel M. Morgan
Legal Aid Society of Cincinnati
215 Ninth Street, Suite 200
Cincinnati Oh 45202

Gretchen J. Hummel
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street #1700
Columbus Oh 43215-4228

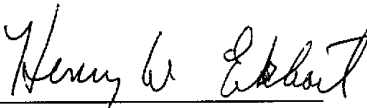
Colleen Mooney
Office of Consumers Counsel
10 West Broad Street, Suite 1800
Columbus Oh 43215

David C. Rinebolt
Ohio Partners for Affordable
Energy
P O Box 1793
Findlay Oh 45839-1793

M. Howard Petricoff
Vorys, Sater, Seymour & Pease
52 East Gay Street
P O Box 1008
Columbus Ohio 43216-1008

Charles Harak
77 Summer Street 10th Flr
Boston Ma 02110

Paul A. Colbert
Cinergy Corp
155 East Broad Street, Suite 21
Columbus Oh 43215


Henry W. Eckhart, Attorney for
People Working Cooperatively, Inc.