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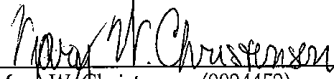
BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Cincinnati Gas & Electric Company For An Increase in Electric Distribution Rates.	) ) ) ) )	Case No. 05-0059-EL-AIR
In the Matter of the Application of The Cincinnati Gas & Electric Company For Approval to Change Accounting Methods.	) ) ) ) )	Case No. 05-0060-EL-AAM

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 (0024452)  
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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, PUCO Case Nos. 99-1658-EL-ETP and related dockets and in Case Nos. 03-0093-EL-ATA, 03-2079-EL-AAM, 03-2081-EL-AAM, and 03-2080-EL-ATA.

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. While the Commission-approved stipulation in Case Nos. 03-0093-EL-ATA provided for CG&E's 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, PWC intervenes in this proceeding to assure CG&E-administered funding for the continuation of energy management, weatherization and DSM programs for consumers in CG&E's service territory, which include PWC's clients. 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 rate application. 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).

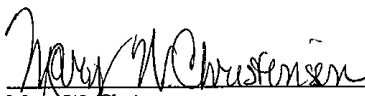
Insofar as PWC's intervention meets the criteria of Section 4903.221, it satisfies  
the standards set forth in the PUCO's rule for intervention contained in Ohio  
Administrative Code Section 4901-1-11, including that its motion is timely and is made  
by a person with a real and substantial interest 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)  
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#### 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 22nd day of  
June, 2005.

  
\_\_\_\_\_  
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