

FILE



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October 19, 2010

RECEIVED - PUCO
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PUCO

PUCO
Docketing Division
180 E. Broad Street, 11th Floor
Columbus, OH 43215

Re: Case No. 10-1395-GA-ATA

Dear Sir/Madam:

Enclosed are the original and 13 copies of the Motion to Intervene by the Edgemont Neighborhood Coalition in the above-captioned matter.

Please return the extra time-stamped copies in the enclosed envelope.

Yours truly,

Ellis Jacobs
Attorney at Law

Enclosures

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.
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

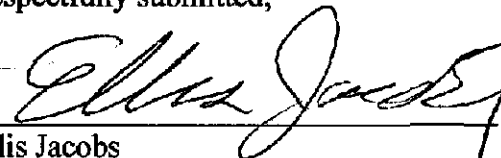
In the Matter of the Application of	:	
Vectren Energy Delivery of Ohio, Inc. to	:	Case No. 10-1395-GA-ATA
File Revised Tariffs Extending Its Low	:	
Income Pilot Program	:	
	:	
	:	
	:	

**MOTION TO INTERVENE
BY THE
EDGEMONT NEIGHBORHOOD COALITION**

The Edgemont Neighborhood Coalition (Edgemont) moves for leave to intervene in the above-captioned matter pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11.

The reasons for granting Edgemont's Motion are further set forth in the attached Memorandum in Support.

Respectfully submitted,



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COUNSEL FOR EDGEMONT

MEMORANDUM IN SUPPORT

I. INTRODUCTION

On September 29, 2010 the PUCO issued a Finding & Order in this docket. It approved Vectren's requested to extend its pilot program which is aimed at helping low-income, low use customers pay their bills. It also instructed the staff to undertake a review of that pilot program.

The Edgemont Neighborhood Coalition is a non-profit corporation based in a low income, African American neighborhood in Dayton, Ohio. The Edgemont Neighborhood is in the service territory which Vectren serves. Many of its members are low-income, low use gas customers of Vectren.

Edgemont works to expand economic and education opportunities and improve the quality of life for its members and all residents of the neighborhood. Edgemont also functions as a small business, operating an office, storefront, community garden, and community computer center. Edgemont has long been concerned with utility matters and for the past twenty years has actively participated in numerous cases before the PUCO.

II. INTERVENTION

Edgemont moves to intervene in this case pursuant to R.C. 4903.221 and Ohio Adm. Code 4901:1-11. Edgemont meets the standards in statute and rule for being granted intervention in this case.

Section 4903.221, Revised Code, provides that any "person who may be adversely affected by a public utilities commission proceeding may intervene in such proceeding." R.C. 4903.221(B) requires the PUCO to consider the following criteria in ruling on motions to intervene:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding; and
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

Edgemont, through its membership, "may be adversely affected" by the review of this pilot program. The review of this program must be thorough if it is to ensure that there is an effective program in the Vectren service territory to assist low-income customers.

Edgemont's interest in this case is as an organization directly representing low-income residents. Edgemont's members are the population to which the pilot program is addressed.

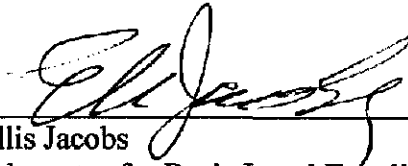
Edgemont's legal position on the merits of the case is that the public interest must be advanced by this program review.

Edgemont's intervention is timely and will not unduly prolong or delay the proceedings. R.C. 4903.221(b) (3). In addition, Edgemont will "significantly contribute to full development and equitable resolution of the factual issues" given the interests Edgemont represents and Edgemont's expertise and experience in issues pertaining to low-income utility consumers. R.C. 4903.221(B) (4). Edgemont accordingly, also meets the similar requirements of Ohio Adm. Code 4901-1-11 for intervention.

Edgemont exclusively represents the interests of low-income customers. As such, it is not only a proper party to this case, it is an essential one.

For these reasons, Edgemont's Motion to Intervene should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ellis Jacobs', is written over a horizontal line.

Ellis Jacobs

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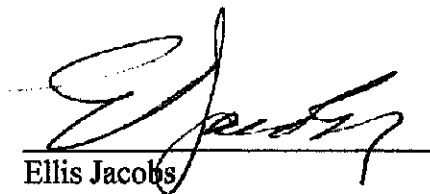
CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was sent via regular U.S. mail to the following persons on the 19th day of October, 2010.

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