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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.)	Case No. 11-3549-EL-SSO
In the Matter of the Application of Duke Energy Ohio for Authority to Amend its Certified Supplier Tariff, P.U.C.O. No. 20.)	Case No. 11-3550-EL-ATA
In the Matter of the Application of Duke Energy Ohio for Authority to Amend its Corporate Separation Plan.)	Case No. 11-3551-EL-UNC

MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF VECTREN RETAIL, LLC D/B/A VECTREN SOURCE

Joseph M. Clark (Counsel of Record)
Director of Regulatory Affairs and Corporate Counsel
VECTREN RETAIL, LLC D/B/A VECTREN SOURCE
6641 North High Street, Suite 200
Worthington, OH 43085
Telephone: (614) 781-1896
Telecopier: (812) 492-9275
jmclark@vectren.com

July 5, 2011

Attorney for Vectren Retail, LLC d/b/a
Vectren Source

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MOTION TO INTERVENE OF VECTREN RETAIL, LLC D/B/A VECTREN SOURCE

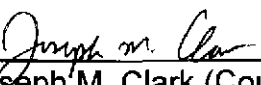
Vectren Retail, LLC d/b/a Vectren Source ("Vectren Source") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On June 20, 2011, Duke Energy Ohio ("DE-Ohio") filed its Application for approval of a standard service offer ("SSO") in the form of an electric security plan ("ESP") under Section 4928.143, Revised Code. DE-Ohio's filing proposes several changes to its current ESP structure, including the use of an auction mechanism to procure default generation energy service to customers who have not chosen a competitive supplier for their generation service. Additionally, DE-Ohio proposes

several changes to its competitive supplier tariff (P.U.C.O. No. 20) and also proposes to offer non-tariffed products and services to DE-Ohio customers.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, Vectren Source has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. Vectren Source believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of Vectren Source will not be adequately represented by other parties to the proceedings and, as such, Vectren Source is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,



Joseph M. Clark (Counsel of Record)
Director of Regulatory Affairs and Corporate
Counsel
VECTREN RETAIL, LLC D/B/A VECTREN SOURCE
6641 North High Street, Suite 200
Worthington, OH 43085
Telephone: (614) 781-1896
Telecopier: (812) 492-9275
jmclark@vectren.com

**Attorney for Vectren Retail, LLC d/b/a
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In support of this Motion to Intervene, Vectren Source states that it is a Competitive Retail Electric Supply ("CRES") provider, as certified by the Commission in Docket Number 11-1078-EL-CRS.¹ Along with commodity supply, Vectren Source also wholly owns Vectren Products and Services, LLC d/b/a GreenStreet Solutions ("GreenStreet") (www.greenstreethome.us), which performs home energy audits and retrofit work identified by the home energy audits. GreenStreet recently expanded its operations into the Cincinnati area.

Vectren Source has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact Vectren Source's ability to market to retail electric customers in DE-Ohio's service territory. Further, DE-Ohio's proposals related to other

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non-tariffed products and services that DE-Ohio may offer may directly or indirectly impact GreenStreet.

Vectren Source's interests are directly related to the merits of this case. Further, Vectren Source's intervention will not unduly prolong or delay these proceedings inasmuch as Vectren Source intends to participate within the bounds of Ohio law and the Commission's rules and has an interest in seeing this case timely resolved. Vectren Source's experience and participation will contribute to the full development and equitable resolution of the factual and other issues in this proceeding. Finally, Vectren Source's ability to protect these interests will be impaired or impeded without its intervention and no other existing party adequately represents Vectren Source's interests, which are unique from all other Parties to this proceeding.

Vectren Source requests the Commission find it is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

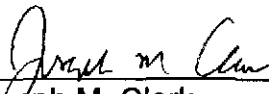


Joseph M. Clark (Counsel of Record)
Director of Regulatory Affairs and Corporate
Counsel
VECTREN RETAIL, LLC D/B/A VECTREN SOURCE
6641 North High Street, Suite 200
Worthington, OH 43085
Telephone: (614) 781-1896
Telecopier: (812) 492-9275
jmclark@vectren.com

**Attorney for Vectren Retail, LLC d/b/a
Vectren Source**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Vectren Retail, LLC d/b/a Vectren Source* was served upon the following parties of record this 5th day of July 2011 via electronic mail.



Joseph M. Clark

Duke Energy Ohio

Amy B. Spiller (Counsel of Record)
Elizabeth H. Watts
Rocco O. D'Ascenzo
139 East Fourth Street, 1303-Main
P.O. Box 961
Cincinnati, Ohio 45201-0960
amy.spiller@duke-energy.com
elizabeth.watts@duke-energy.com
rocco.dascenzo@duke-energy.com

Office of the Ohio Consumers' Counsel

Janine L. Migden-Ostrander, Consumers'
Counsel
Jeffrey L. Small, Counsel of Record
Joseph P. Serio
Melissa R. Yost
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
small@occ.state.oh.us
serio@occ.state.oh.us
yost@occ.state.oh.us

Industrial Energy Users-Ohio

Samuel C. Randazzo (Counsel of Record)
Frank P. Darr
Joseph E. Oliker
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, Ohio 43215
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com

Ohio Energy Group

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz, & Lowery
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bklawfirm.com
mkurtz@bklawfirm.com

Ohio Partners for Affordable Energy

Colleen L. Mooney
231 West Lima Street
Findlay, Ohio 45839-1793
cmooney2@columbus.rr.com

Ohio Environmental Council

Trent A. Dougherty (Counsel of Record)
Nolan Moser
E. Camille Yancey
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212-3449
trent@theoec.org
nolan@theoec.org
camille@theoec.org

Greater Cincinnati Health Council

Douglas E. Hart
441 Vine Street, Suite 4192
Cincinnati, Ohio 45202
dhart@douglasshart.com

FirstEnergy Solutions Corp.

Mark A. Hayden (Counsel of Record)
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
haydenm@firstenergycorp.com

David A. Kutić
Jones Day
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
dakutik@jonesday.com

Allison E. Haedt
Jones Day
P.O. Box 165017
Columbus, Ohio 43216-5017
aehaedt@jonesday.com

James F. Lang
Laura C. McBride
N. Trevor Alexander
Calfee, Halter & Griswold LLP
1400 Key Bank Center
800 Superior Avenue
Cleveland, Ohio 44114
jl原因@calfee.com
lmcbride@calfee.com
talexander@calfee.com

Ohio Manufacturers' Association

Lisa G. McAlister
Matthew M. Warnock
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-4291
lmcalister@bricker.com
mwarnock@bricker.com

People Working Cooperatively, Inc.

Mary W. Christensen
Christensen & Christensen LLP
8760 Orion Place, Suite 300
Columbus, Ohio 43240-2109
mchristensen@columbuslaw.org

The Kroger Company

John W. Bentine
Mark S. Yurick (Counsel of Record)
Zachary D. Kravitz
Chester Willcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215
jbentine@cwslaw.com
myurick@cwslaw.com
zkravitz@cwslaw.com

City of Cincinnati

Thomas J. O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
tobrien@bricker.com

Environmental Law & Policy Center

Tara C. Santarelli
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212
tsantarelli@elpc.org

**Constellation NewEnergy, Inc. and
Constellation Energy Commodities Group,
Inc.**

M. Howard Petricoff
Michael J. Settineri
Vorys, Sater, Seymore and Pease LLC
52 East Gay Street
Columbus, Ohio 43215
mhpetricoff@vorys.com
mjsettineri@vorys.com

**Columbus Southern Power and Ohio Power
Company (Jointly AEP-Ohio)**

Matthew J. Satterwhite
Erin C. Miller
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
mjsatterwhite@aep.com
ecmiller1@aep.com

Public Utilities Commission of Ohio

Christine Pirik
Katie L. Stenman
Attorney Examiners
180 East Broad Street, 12th Floor
Columbus, Ohio 43215
katie.stenman@puc.state.oh.us
christine.pirik@puc.state.oh.us

Ohio Attorney General's Office

Public Utilities Section
John Jones
Steven Beeler
180 East Broad Street, 6th Floor
Columbus, Ohio 43215
john.jones@puc.state.oh.us
steven.beeler@puc.state.oh.us