

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Vectren)
Energy Delivery Ohio, Inc. for Approval of) Case No. 18-0049-GA-ALT
an Alternative Rate Plan.)

In the Matter of the Application of Vectren)
Energy Delivery Ohio, Inc. for Approval of) Case No. 18-0298-GA-AIR
an Increase in Gas Rates.)

In the Matter of the Application of Vectren)
Energy Delivery Ohio, Inc. for Approval of) Case No. 18-0299-GA-ALT
an Alternative Rate Plan.)

**MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (“RESA”), pursuant to Section 4903.221 of the Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, moves to intervene in the above-styled proceedings, which have been consolidated. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, RESA respectfully requests that the Public Utilities Commission of Ohio grant this motion to intervene and that RESA be made a full party of record.

Respectfully Submitted,

/s/ Gretchen L. Petrucci
Michael J. Settineri (0073369), Counsel of Record
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, OH 43215
Settineri: 614-464-5462
Petrucci: 614-464-5407
mjsettineri@vorys.com
glpetrucci@vorys.com

Counsel for the Retail Energy Supply Association

**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association¹ (“RESA”) is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. Many of RESA’s members are certified as competitive retail natural gas service (“CRNGS”) providers and are active in the Ohio retail markets providing service to residential, commercial, industrial and governmental customers. In addition, some of RESA’s members currently provide competitive retail natural gas service to retail customers in the service area of Vectren Energy Delivery Ohio, Inc. (“VEDO”).

The standard for intervention at the Public Utilities Commission of Ohio (“Commission”) is governed by Rule 4901-1-11, Ohio Administrative Code, which was promulgated pursuant to Section 4903.221, Revised Code. Rule 4901-1-11, Ohio Administrative Code, states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.

When deciding a motion to intervene, the factors that the Commission considers in implementing the above rule are the nature of the intervenor’s interest, the extent that interest is

¹ The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. *See also* Section 4903.221(B), Revised Code. A review of the intervention criteria in light of the following facts supports granting RESA's intervention.

In these consolidated matters, VEDO requests authority to increase its rates, and establish a new energy conversion factor use to measure customer energy usage in VEDO's territory. The rates and how energy is measured are of interest to RESA and will directly impact the members' business in the territory. Also, VEDO proposes a pilot program for encouraging growth in its natural gas customers. This proposal, if properly crafted and supported, could impact RESA members' future activities in the VEDO territory. As a result, RESA members have existing and potential business interests that will be directly and immediately affected by the outcome of these consolidated proceedings. RESA is an association of knowledgeable, experienced competitive providers who can contribute to a just and expeditious resolution of the issues involved. No other party to this proceeding represents RESA's interests. There is no CRNGS provider that is a party to the consolidated proceedings yet. Also, RESA's intervention request is timely and its intervention would not result in an undue delay of the proceeding.

The undersigned will accept service by electronic mail.

WHEREFORE, RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record in these proceedings.

Respectfully Submitted,

/s/ Gretchen L. Petrucci
Michael J. Settineri (0073369), Counsel of Record
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215

Settineri: 614-464-5462
Petrucci: 614-464-5407
mjsettineri@vorys.com
glpetrucci@vorys.com

Counsel for the Retail Energy Supply Association

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 1st day of August 2018.

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

Mark A. Whitt
Andrew J. Campbell
Shannon K. Rust
Whitt Sturtevant LLP
The KeyBank Building, Suite 1590
88 East Broad Street
Columbus, OH 43215
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
rust@whitt-sturtevant.com

Steven D. Lesser
N. Trevor Alexander
Mark T. Keaney
Calfee, Halter & Griswold LLP
41 S. High Street
1200 Huntington Center
Columbus, OH 43215
slesser@calfee.com
mkeaney@calfee.com
talexander@calfee.com

P. Jason Stephenson
Vectren Corporation
One Vectren Square
211 N.W. Riverside Drive
Evansville, IN 47708
jstephenson@vectren.com

William J. Michael
Bryce McKenney
Zachary E. Woltz
Amy Botschner-O'Brien
Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, OH 43215-4213
william.michael@occ.ohio.gov
bryce.mckenney@occ.ohio.gov
zachary.woltz@occ.ohio.gov
amy.botschner.obrien@occ.ohio.gov

Frank P. Darr
Matthew R. Pritchard
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
fdarr@mcneeslaw.com
mpritchard@mcneeslaw.com

Joseph Olikier
Michael Nugent
IGS Energy
6100 Emerald Parkway
Dublin, OH 43016
joliker@igsenergy.com
mnugent@igsenergy.com

Madeline Fleisher
Environmental Law & Policy Center
21 West Broad Street, 8th Floor
Columbus, OH 43215
mfleisher@elpc.org

Colleen L. Mooney
Ohio Partners for Affordable Energy
P.O. Box 12451
Columbus, OH 43212-2451
cmooney@ohiopartners.org

M. Anthony Long
Honda North America, Inc.
24025 Honda Parkway
Marysville, OH 43040
tony_long@hna.honda.com

Werner Margard
Assistant Attorney General
Ohio Attorney General's Office
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215
werner.margard@ohioattorneygeneral.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/1/2018 8:28:30 AM

in

Case No(s). 18-0049-GA-ALT, 18-0298-GA-AIR, 18-0299-GA-ALT

Summary: Motion Motion to Intervene electronically filed by Mrs. Gretchen L. Petrucci on behalf of Retail Energy Supply Association