

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of)
Vectren Energy Delivery of Ohio, Inc.)
For Approval of a General Exemption)
of Certain Gas Commodity Sales or)
Ancillary Services from Chapters)
4906, 4909 and 4935 except)
Sections 4905.10, 4935.01 and)
4935.03 And From Specified Sections)
of Chapter 4933 of the Revised Code.)

Case No. 07-1285-GA-EXM

**MOTION OF OHIO FARM BUREAU FEDERATION TO INTERVENE
AND MEMORANDUM IN SUPPORT**

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January 14, 2007

**Chief Legal Counsel for the Ohio
Farm Bureau Federation**

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**BEFORE
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| of Certain Gas Commodity Sales or |) | Case No. 07-1285-GA-EXM |
| Ancillary Services from Chapters |) | |
| 4906, 4909 and 4935 except |) | |
| Sections 4905.10, 4935.01 and |) | |
| 4935.03 And From Specified Sections |) | |
| of Chapter 4933 of the Revised Code. |) | |

**MOTION TO INTERVENE
OF THE OHIO FARM BUREAU FEDERATION**

The Ohio Farm Bureau Federation ("OFBF") hereby respectfully moves for leave to intervene in the above-captioned matters pursuant to Section 4903.221, Ohio Revised Code ("O.R.C.") and Section 4901-1-1-11 of the Commissions Code of Rules and Regulations, with full powers and rights granted, by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations, to intervening parties. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry Gearhardt", written over a horizontal line.

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**On Behalf of the Ohio Farm
Bureau Federation**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of |) | |
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| 4935.03 And From Specified Sections |) | |
| of Chapter 4933 of the Revised Code. |) | |

**MEMORANDUM IN SUPPORT OF THE MOTION TO INTERVENE
OF THE OHIO FARM BUREAU FEDERATION**

The Ohio Farm Bureau Federation ("OFBF") should be permitted to intervene in this matter pursuant to Section 4902.221, O.R.C., and the Commission's Rules and Regulation, Section 4901-01-11 (B), Ohio Administrative Code ("O.A.C."). As required by those provisions OFBF is a real parties in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding nor prejudice any existing party.

OFBF is a member organization representing the interests of over 235,000 member families in rural, suburban and urban areas. The organization has worked with both utilities and farm, small business and residential energy consumers on customer choice program provisions, providing, information, research and public outreach on how consumers can work with their respective utility through such programs to help control their energy costs.

In addition, OFBF has members who receive utility service from Vectren Energy Delivery of Ohio, Inc. OFBF has participated in extensive working group discussions with the utility, energy service providers, the Ohio Consumers Counsel and consumer groups to create many of the customer choice program provisions now being considered by the Commission in this case.

OFBF's participation in these proceedings will not cause undue delay, will not unjustly prejudice an existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in these proceedings.

Moreover, other parties to the proceedings will not adequately represent the interests of OFBF because of the unique perspective it brings to utility matters.

Therefore, OFBF is entitled to intervene in these proceedings with full powers and rights granted, by the Commission specifically, by statute, and by provisions of the Commission's Codes of Rules and Regulations, to intervening parties.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry Gearhardt", written over a horizontal line.

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**On Behalf of the Ohio Farm
Bureau Federation**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene and Memorandum in Support were served by regular U.S. Mail, postage prepaid, upon the parties of record identified below on this 14th day of January, 2008.

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