

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 Natural Gas Commodity Sales)
Services or Ancillary Services from)
Chapters 4905, 4909, and 4935 Except)
Sections 4905.10, 4935.01, and 4935.03,)
and from Specified Sections of)
Chapter 4933 of the Revised Code.)

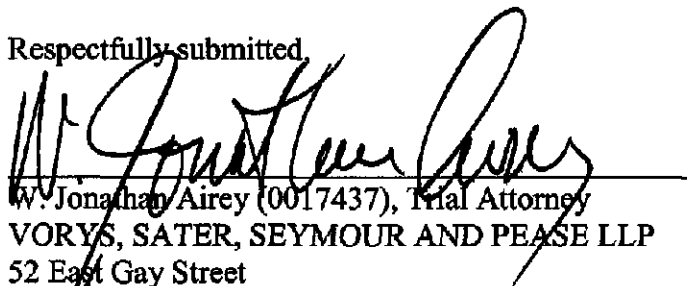
Case No. 07-1285-GA-EXM

**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR LEAVE TO INTERVENE**

Now comes Industrial Energy Users-Ohio ("IEU-Ohio"), and respectfully moves the Commission for leave to intervene in this matter pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. IEU-Ohio has a real, direct and substantial interest in the application filed by Vectren Energy Delivery of Ohio, Inc., ("VEDO") and is so situated that the disposition of this proceeding may impair or impede IEU-Ohio's ability to protect that interest. Moreover, IEU-Ohio's interest in this proceeding is not adequately represented by any existing party and granting this motion to intervene will not unduly delay these proceedings or unjustly prejudice any party.

The attached memorandum sets forth the reasons supporting this motion.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

I. Introduction

The Applicant submits that the application was filed pursuant to Section 4929.04, Revised Code for approval of an exemption from chapters and sections of the Revised Code specified in Section 4929.04, Revised Code, for the provision of all commodity sale services. This exemption will affect customers served by VEDO Rate Schedules 310 (Residential Sales Service), 315 (Residential Transportation Service), 320 (General Sales Service), 325 (General Transportation Service), 330 (Large General Sales Service), 340 (Interruptible Sales Service), 341 (Dual Fuel Sales Service), 345 (Large General Transportation Service), 380 (Pooling Service [Large General]), and 385 (Pooling Service [Residential and General]). Additionally, two new rate schedules applicable to suppliers (Rate 395-SSO Supplier Service and Rate 396-SCO Supplier Service) are proposed.

The application is also submitted pursuant to Section 4929.11, Revised Code for approval of the proposed Exit Transition Costs (ETC) Rider, the purpose of which is to recover Merchant Function Exit Transition Costs from affecting customers. This rider will recover incremental implementation costs and recover/pass back specified costs. VEDO also alleges that the application is also made pursuant to Section 4905.13, Revised Code for all applicable accounting authority necessary to implement the ETC Rider.

IEU-Ohio's membership, consisting of many large volume transportation customers of VEDO, may be adversely impacted if the application is granted. Accordingly, IEU-Ohio moves the Commission for leave to intervene in this proceeding.

II. Intervention

IEU-Ohio has a real and substantial interest in this proceeding and should be granted leave to intervene in order to protect its interests and the interests of its members, as active and significant consumers of VEDO gas transportation services. Rule 4901-1-11(A) states:

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

* * *

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.

Among the factors to be considered are the nature of the intervenor's interests, the extent to which those interests are 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 or unjustly prejudice an existing party. *Id.* at (B). See also R.C. 4903.221(B). A review of these factors compels IEU-Ohio's intervention here.

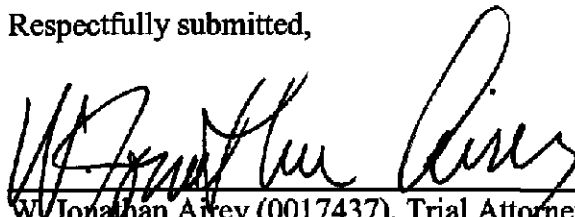
IEU-Ohio is an association of large end-use energy consumers and often represents the interests of its membership on energy-related matters. A current listing of IEU-Ohio's member companies is available on IEU-Ohio's website at <http://www.ieu-ohio.org>, several of which have chosen to participate in this proceeding. Many of IEU-Ohio's members purchase natural gas service from VEDO, and as a consequence, they and IEU-Ohio have a direct and substantial interest in the terms and conditions of VEDO's transportation tariffs.

IEU-Ohio submits that its participation in this proceeding, with the experience and expertise that it brings, will contribute to a just and expeditious resolution of the issues raised by the Application. IEU-Ohio further submits that its intervention will not unduly delay the proceeding or unjustly prejudice an existing party. Without the ability to participate, however, IEU-Ohio's interests will not be adequately protected by the existing parties.

III. Conclusion

For the reasons stated above, IEU-Ohio respectfully requests that its Motion for Leave to Intervene be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Jonathan Airey', is written over a horizontal line.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing motion was served by electronic mail and by regular U.S. mail, postage prepaid, this 15th day of January, 2008, on the following:

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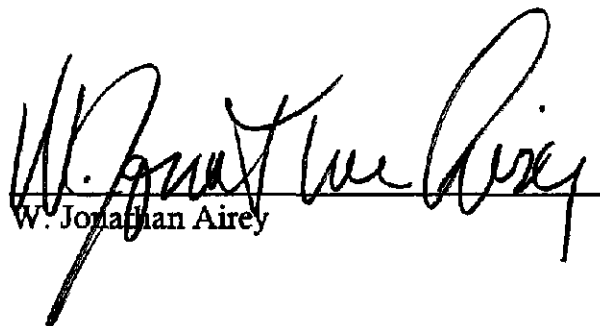
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