

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 Natural Gas)
Commodity Sales Services or Ancillary)
Services from Chapters 4905, 4909, and 4935) Case No. 07-1285-GA-EXM
except Section 4905.10, 4935.01, and)
4935.03, and From specified sections of)
Chapter 4933 of the Revised Code.)

**MOTION TO INTERVENE
OF
DTE ENERGY TRADING, INC.**

DTE Energy Trading, Inc. ("DTE Energy Trading") hereby moves to intervene in the above-captioned proceeding pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11(F). As set forth in the Memorandum in Support, DTE Energy Trading submits that it has a real and substantial interest in this proceeding, that it is so situated that the disposition of this proceeding without DTE Energy Trading's participation may impair or impede its ability to protect that interest, and that its participation in this proceeding will contribute to a just result. DTE Energy Trading further submits that its interest in this proceeding is not represented by any existing party and that granting its motion to intervene will not unduly delay this proceeding or unjustly prejudices any existing party.

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MEMORANDUM IN SUPPORT

On December 21, 2007, Vectren Energy Delivery of Ohio, Inc. ("Vectren") filed an Application that would begin the process of Vectren's exit from the merchant function in a phased manner generally similar to the process in progress for Dominion East Ohio. DTE Energy Trading has been an active participant in Vectren's Merchant Function Working Group, the "precursor" process leading to this application for several months.

The Application filed by Vectren, if granted by the Commission, will significantly impact DTE Energy Trading and the services it provides. DTE Energy Trading is a wholesale supplier of natural gas and currently supplies gas to Dominion East Ohio's competitively-bid standard service offer program promulgated pursuant to Case No. 05-474-GA-ATA. As a result of DTE Energy Trading's familiarity with the operation of a competitively-bid standard service offer supply arrangement, it has a significant business interest to protect through its participation in this case.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11(F), DTE Energy Trading is a real party in interest herein, whose interest is not now represented, who can make a contribution to this proceeding and will not unduly delay the proceeding or prejudice any existing party. DTE Energy Trading submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding; that its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party; and that it agrees to be bound by record with respect to other matters previously made in the proceeding.

WHEREFORE, DTE Energy Trading respectfully requests that its motion to intervene be granted.

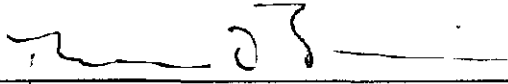
Respectfully submitted on behalf of
DTE ENERGY TRADING, INC.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 16th day of January 2008 *via* U.S. mail, postage prepaid.



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