



1077 Celestial Street • Rookwood Bldg. • Suite 110
Cincinnati, Ohio 45202-1629
(513) 621-1113
(800) 598-2046
(513) 621-3773 Fax

RECEIVED-DOCKETING DIV

2008 JAN 22 AM 10:02

PUCO

January 21, 2008

VIA UPS NEXT DAY AIR SAVER DELIVERY

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 07-1285-GA-EXM

Ladies and Gentlemen:

Enclosed for filing are an original and ten copies of Stand Energy Corporation's Motion to Intervene and Memorandum in Support in the above-captioned case.

Sincerely,

John M. Dosker
General Counsel

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
Technician SM Date Processed 1/22/08

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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)
4935.03 and from specified sections of)
Chapter 4933 of the Revised Code.)

Case No. 07-1285-GA-EXM

**STAND ENERGY CORPORATION'S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

Stand Energy Corporation, by and through the undersigned counsel, pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, moves the Commission for Leave to Intervene in the above-styled and numbered proceeding relating to the Application filed by Vectren Energy Delivery of Ohio for approval of a general exemption of certain natural gas commodity sales services or ancillary services from specified provisions of the Ohio Revised Code. A Memorandum in Support of this motion is attached.

Respectfully submitted,



John M. Dosker, General Counsel, TA
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629
Telephone: (513) 621-1113
Facsimile: (513) 621-3773
E-Mail: jdosker@stand-energy.com

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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)
4935.03 and from specified sections of)
Chapter 4933 of the Revised Code.)

Case No. 07-1285-GA-EXM

**MEMORANDUM IN SUPPORT OF
STAND ENERGY CORPORATION'S MOTION TO INTERVENE**

On December 21, 2007, Vectren Energy Delivery of Ohio filed an application for approval to change the commodity procurement process currently utilized and replace it with an auction process. This application results from a collaborative working group in which Stand Energy Corporation has been an active participant. Accordingly, Stand Energy Corporation requests the Commission's leave to intervene in this proceeding.

Stand Energy Corporation ("SEC"), is a Kentucky Corporation, with its primary office located at 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629. SEC is engaged in the marketing of natural gas to numerous end use customers throughout Ohio, including industrial and commercial customers on the Vectren Energy Delivery of Ohio system.

SEC has a real and substantial interest in these proceedings. Because of differing commercial goals and direction, SEC avers that no other potential participant can adequately represent its interests in this case. Pursuant to RC §4903.221 and OAC §4901-1-11, SEC respectfully requests that the Commission grant it full Intervenor status. For purposes of considering requests for leave to intervene, OAC 4901-1-11(A) provides that:

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.

Further, RC 4903.221 (B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

(1) The nature and extent of the prospective intervenor's interest; (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case; (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

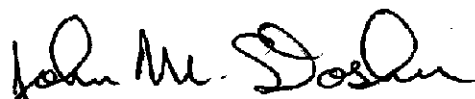
OAC 4901-1-11 (B) also provides for the following factors to be considered:

(1) The nature of the person's interest; (2) The extent to which the person's interest is represented by existing parties; (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

As noted above, Stand Energy is a natural gas marketer on Vectren's system, and serves substantial end-user loads on Vectren's transportation programs. The disposition of these issues without Stand Energy's participation will impair or impede Stand Energy's ability to protect its interests. No other party participating in these proceedings can adequately protect Stand Energy's interests, and accordingly, Stand Energy respectfully asserts that it would be inappropriate to resolve these issues without Stand Energy's participation. Stand Energy's interests and operational experience are substantially and directly related to these issues and the merits of this proceeding. Stand Energy's intervention will contribute to the full and equitable resolution of these matters, and will assist in the expeditious resolution of these issues. Lastly, Stand Energy's intervention will not unduly delay or unjustly prejudice any existing party.

WHEREFORE, Stand Energy Corporation respectfully submits that the Commission should grant its request to intervene in the above-referenced dockets.

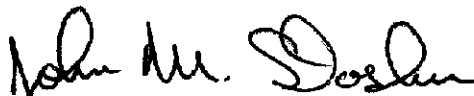
Respectfully submitted,



John M. Dosker, General Counsel, TA
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629
Telephone: (513) 621-1113
Facsimile: (513) 621-3773
E-Mail: jdosker@stand-energy.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's Motion to Intervene and Memorandum in Support was served upon the following parties of record via ordinary U.S. Mail postage prepaid on January 22, 2008.



John M. Dosker

Steve Puican
Public Utilities Commission of Ohio
180 East Broad Street 3rd Floor
Columbus, Ohio 43215-3707

Vectren Energy Delivery of Ohio
Jerrold L. Ulrey
One Vectren Square
Evansville, IN 47708

Gretchen J. Hummel, Esq.
McNees, Wallance & Nurick
21 East State Street, 17th Floor
Columbus, Ohio 43215-4281

Joe Serio, Esq.
Office of the Ohio Consumers' Counsel
10 West Broad Street
Suite 1800
Columbus, Ohio 43215-3485

Ohio Gas Marketer's Group
Howard Petricoff, Esq.
Vorys, Sater, Seymour & Pease, LLP
52 East Gay Street
Columbus, Ohio 43215-3108

John W. Bentine, Esq.
Chester, Willcox & Saxbe, LLP
65 East State Street
Suite 1000
Columbus, OH 43215-4213

Ohio Partners For Affordable Energy
Colleen L. Mooney Esq.
David C. Rinebolt, Esq.
231 West Lima Street
P.O. Box 1793
Findlay, Ohio 45839-1793

Larry Gearhardt, Esq.
Ohio Farm Bureau Federation, Inc.
280 North High Street
P.O. Box 479
Columbus, Ohio 43216

Bobby Singh, Esq.
Senior Attorney
Integrus Energy Services, Inc.
300 West Wilson Bridge Road
Suite 350
Worthington, Ohio 43085-2279

Dominion Retail, Inc.
Gary A. Jeffries, Senior Counsel
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817

Barth Royer, Esq.
Bell, Royer & Sanders Co. L.P.A.
33 South Grant Avenue
Columbus, Ohio 43215-3900

Industrial Energy Users-Ohio
Jonathan Airey, Esq.
Vorys, Sater, Seymour & Pease, LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43215-1008

DTE Energy Trading, Inc.
Thomas J. O'Brien, Esq.
Bricker & Eckler, LLP
100 South Third Street
Columbus, Ohio 43215-4291