

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.	)	Case No. 11-3549-EL-SSO
In the Matter of the Application of Duke Energy Ohio for Authority to Amend its Certified Supplier Tariff, P.U.C.O. No. 20.	)	Case No. 11-3550-EL-ATA
In the Matter of the Application of Duke Energy Ohio for Authority to Amend its Corporate Separation Plan.	)	Case No. 11-3551-EL-UNC

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MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF VECTREN RETAIL, LLC D/B/A VECTREN SOURCE

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Joseph M. Clark (Counsel of Record)  
 Director of Regulatory Affairs and Corporate Counsel  
 VECTREN RETAIL, LLC D/B/A VECTREN SOURCE  
 6641 North High Street, Suite 200  
 Worthington, OH 43085  
 Telephone: (614) 781-1896  
 Telecopier: (812) 492-9275  
 jmclark@vectren.com

July 5, 2011

Attorney for Vectren Retail, LLC d/b/a  
Vectren Source

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**MOTION TO INTERVENE OF VECTREN RETAIL, LLC D/B/A VECTREN SOURCE**

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Vectren Retail, LLC d/b/a Vectren Source ("Vectren Source") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On June 20, 2011, Duke Energy Ohio ("DE-Ohio") filed its Application for approval of a standard service offer ("SSO") in the form of an electric security plan ("ESP") under Section 4928.143, Revised Code. DE-Ohio's filing proposes several changes to its current ESP structure, including the use of an auction mechanism to procure default generation energy service to customers who have not chosen a competitive supplier for their generation service. Additionally, DE-Ohio proposes

several changes to its competitive supplier tariff (P.U.C.O. No. 20) and also proposes to offer non-tariffed products and services to DE-Ohio customers.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, Vectren Source has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. Vectren Source believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of Vectren Source will not be adequately represented by other parties to the proceedings and, as such, Vectren Source is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

  
\_\_\_\_\_  
Joseph M. Clark (Counsel of Record)  
Director of Regulatory Affairs and Corporate  
Counsel  
VECTREN RETAIL, LLC D/B/A VECTREN SOURCE  
6641 North High Street, Suite 200  
Worthington, OH 43085  
Telephone: (614) 781-1896  
Telecopier: (812) 492-9275  
jmclark@vectren.com

**Attorney for Vectren Retail, LLC d/b/a  
Vectren Source**

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**MEMORANDUM IN SUPPORT**

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In support of this Motion to Intervene, Vectren Source states that it is a Competitive Retail Electric Supply ("CRES") provider, as certified by the Commission in Docket Number 11-1078-EL-CRS.<sup>1</sup> Along with commodity supply, Vectren Source also wholly owns Vectren Products and Services, LLC d/b/a GreenStreet Solutions ("GreenStreet") ([www.greenstreethome.us](http://www.greenstreethome.us)), which performs home energy audits and retrofit work identified by the home energy audits. GreenStreet recently expanded its operations into the Cincinnati area.

Vectren Source has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact Vectren Source's ability to market to retail electric customers in DE-Ohio's service territory. Further, DE-Ohio's proposals related to other

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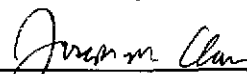
<sup>1</sup> Vectren Source has also been licensed as a competitive retail natural gas supply ("CRNGS") provider in Ohio since 2002, including in DE-Ohio's service territory. See PUCO Case No. 02-1668-GA-CRS.

non-tariffed products and services that DE-Ohio may offer may directly or indirectly impact GreenStreet.

Vectren Source's interests are directly related to the merits of this case. Further, Vectren Source's intervention will not unduly prolong or delay these proceedings inasmuch as Vectren Source intends to participate within the bounds of Ohio law and the Commission's rules and has an interest in seeing this case timely resolved. Vectren Source's experience and participation will contribute to the full development and equitable resolution of the factual and other issues in this proceeding. Finally, Vectren Source's ability to protect these interests will be impaired or impeded without its intervention and no other existing party adequately represents Vectren Source's interests, which are unique from all other Parties to this proceeding.

Vectren Source requests the Commission find it is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,



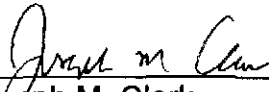
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Joseph M. Clark (Counsel of Record)  
Director of Regulatory Affairs and Corporate  
Counsel  
VECTREN RETAIL, LLC D/B/A VECTREN SOURCE  
6641 North High Street, Suite 200  
Worthington, OH 43085  
Telephone: (614) 781-1896  
Telecopier: (812) 492-9275  
jmclark@vectren.com

**Attorney for Vectren Retail, LLC d/b/a  
Vectren Source**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Vectren Retail, LLC d/b/a Vectren Source* was served upon the following parties of record this 5th day of July 2011 via electronic mail.

  
\_\_\_\_\_  
Joseph M. Clark

### **Duke Energy Ohio**

Amy B. Spiller (Counsel of Record)  
Elizabeth H. Watts  
Rocco O. D'Ascenzo  
139 East Fourth Street, 1303-Main  
P.O. Box 961  
Cincinnati, Ohio 45201-0960  
[amy.spiller@duke-energy.com](mailto:amy.spiller@duke-energy.com)  
[elizabeth.watts@duke-energy.com](mailto:elizabeth.watts@duke-energy.com)  
[rocco.dascenzo@duke-energy.com](mailto:rocco.dascenzo@duke-energy.com)

### **Office of the Ohio Consumers' Counsel**

Janine L. Migden-Ostrander, Consumers'  
Counsel  
Jeffrey L. Small, Counsel of Record  
Joseph P. Serio  
Melissa R. Yost]  
Assistant Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
[small@occ.state.oh.us](mailto:small@occ.state.oh.us)  
[serio@occ.state.oh.us](mailto:serio@occ.state.oh.us)  
[yost@occ.state.oh.us](mailto:yost@occ.state.oh.us)

### **Industrial Energy Users-Ohio**

Samuel C. Randazzo (Counsel of Record)  
Frank P. Darr  
Joseph E. Oliker  
McNees Wallace & Nurick LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215  
[sam@mwncmh.com](mailto:sam@mwncmh.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[joliker@mwncmh.com](mailto:joliker@mwncmh.com)

### **Ohio Energy Group**

David F. Boehm  
Michael L. Kurtz  
Boehm, Kurtz, & Lowery  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
[dboehm@bkllawfirm.com](mailto:dboehm@bkllawfirm.com)  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)

### **Ohio Partners for Affordable Energy**

Colleen L. Mooney  
231 West Lima Street  
Findlay, Ohio 45839-1793  
[cmooney2@columbus.rr.com](mailto:cmooney2@columbus.rr.com)

### **Ohio Environmental Council**

Trent A. Dougherty (Counsel of Record)  
Nolan Moser  
E. Camille Yancey  
1207 Grandview Avenue, Suite 201  
Columbus, Ohio 43212-3449  
[trent@theoec.org](mailto:trent@theoec.org)  
[nolan@theoec.org](mailto:nolan@theoec.org)  
[camille@theoec.org](mailto:camille@theoec.org)

### **Greater Cincinnati Health Council**

Douglas E. Hart  
441 Vine Street, Suite 4192  
Cincinnati, Ohio 45202  
[dhart@douglasshart.com](mailto:dhart@douglasshart.com)

### **FirstEnergy Solutions Corp.**

Mark A Hayden (Counsel of Record)  
FirstEnergy Service Company  
76 South Main Street  
Akron, Ohio 44308  
[haydenm@firstenergycorp.com](mailto:haydenm@firstenergycorp.com)

David A. Kutic  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
[dakutik@jonesday.com](mailto:dakutik@jonesday.com)

Allison E. Haedt  
Jones Day  
P.O. Box 165017  
Columbus, Ohio 43216-5017  
[aehaedt@jonesday.com](mailto:aehaedt@jonesday.com)

James F. Lang  
Laura C. McBride  
N. Trevor Alexander  
Calfee, Halter & Griswold LLP  
1400 Key Bank Center  
800 Superior Avenue  
Cleveland, Ohio 44114  
[jiang@calfee.com](mailto:jiang@calfee.com)  
[lmcbride@calfee.com](mailto:lmcbride@calfee.com)  
[talexander@calfee.com](mailto:talexander@calfee.com)

**Ohio Manufacturers' Association**

Lisa G. McAlister  
Matthew M. Warnock  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, Ohio 43215-4291  
[lmcalister@bricker.com](mailto:lmcalister@bricker.com)  
[mwarnock@bricker.com](mailto:mwarnock@bricker.com)

**People Working Cooperatively, Inc.**

Mary W. Christensen  
Christensen & Christensen LLP  
8760 Orion Place, Suite 300  
Columbus, Ohio 43240-2109  
[mchristensen@columbuslaw.org](mailto:mchristensen@columbuslaw.org)

**The Kroger Company**

John W. Bentine  
Mark S. Yurick (Counsel of Record)  
Zachary D. Kravitz  
Chester Willcox & Saxbe, LLP  
65 East State Street, Suite 1000  
Columbus, Ohio 43215  
[jbentine@cwslaw.com](mailto:jbentine@cwslaw.com)  
[myurick@cwslaw.com](mailto:myurick@cwslaw.com)  
[zkravitz@cwslaw.com](mailto:zkravitz@cwslaw.com)

**City of Cincinnati**

Thomas J. O'Brien  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, Ohio 43215  
[tobrien@bricker.com](mailto:tobrien@bricker.com)

**Environmental Law & Policy Center**

Tara C. Santarelli  
1207 Grandview Avenue, Suite 201  
Columbus, Ohio 43212  
[tsantarelli@elpc.org](mailto:tsantarelli@elpc.org)

**Constellation NewEnergy, Inc. and  
Constellation Energy Commodities Group,  
Inc.**

M. Howard Petricoff  
Michael J. Settineri  
Vorys, Sater, Seymour and Pease LLC  
52 East Gay Street  
Columbus, Ohio 43215  
[mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)

**Columbus Southern Power and Ohio Power  
Company (Jointly AEP-Ohio)**

Matthew J. Satterwhite  
Erin C. Miller  
American Electric Power Service Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, Ohio 43215  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)  
[ecmiller1@aep.com](mailto:ecmiller1@aep.com)

**Public Utilities Commission of Ohio**

Christine Pirik  
Katie L. Stenman  
Attorney Examiners  
180 East Broad Street, 12<sup>th</sup> Floor  
Columbus, Ohio 43215  
[katie.stenman@puc.state.oh.us](mailto:katie.stenman@puc.state.oh.us)  
[christine.pirik@puc.state.oh.us](mailto:christine.pirik@puc.state.oh.us)

**Ohio Attorney General's Office**

Public Utilities Section  
John Jones  
Steven Beeler  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
[john.jones@puc.state.oh.us](mailto:john.jones@puc.state.oh.us)  
[steven.beeler@puc.state.oh.us](mailto:steven.beeler@puc.state.oh.us)