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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke )  
Energy Ohio for an Energy Efficiency Cost )  
Recovery Mechanism and for Approval of ) Case No. 11-4393-EL-RDR  
Additional Programs for Inclusion in its )  
Existing Portfolio. )

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

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August 12, 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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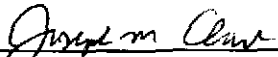
Vectren Retail, LLC d/b/a Vectren Source ("Vectren Source") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On July 20, 2011, Duke Energy Ohio ("DE-Ohio") filed its Application for approval of a proposed cost recovery mechanism for its energy efficiency compliance programs and portfolio. DE-Ohio also proposed three new programs for inclusion in its existing energy efficiency and peak demand reduction ("EE/PDR") program portfolio.

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,

  
\_\_\_\_\_  
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**MEMORANDUM IN SUPPORT**

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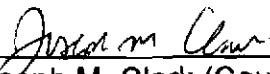
Vectren Source is a Competitive Retail Natural Gas Supply ("CRNGS") provider and a Competitive Retail Electric Supply ("CRES") provider, as certified by the Commission in Docket Numbers 02-1668-GA-CRS and 11-1078-EL-CRS, respectively. Vectren Source also wholly owns Vectren Products and Services, LLC 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 began its operations in the Cleveland, Ohio area and recently expanded its operations into the Cincinnati, Ohio area.

Vectren Source has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact GreenStreet and its business opportunities in DE-Ohio's territory. 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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**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 12th day of August 2011 via U.S. Mail.

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

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