

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton)	
Power and Light Company for Approval of a)	Case No. 13-1631-EL-UNC
Revised Bill Format for Electric Service.)	

**MOTION TO INTERVENE
OF INTERSTATE GAS SUPPLY, INC., DBA IGS ENERGY**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, the Interstate Gas Supply, Inc., dba IGS Energy ("IGS Energy") moves to intervene in this proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, IGS Energy respectfully requests that the Commission grant its motion to intervene as a full party of record.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT OF THE MOTION TO INTERVENE OF
INTERSTATE GAS SUPPLY, INC., DBA IGS ENERGY**

On November 1, 2013, The Dayton Power and Light Company (“DP&L”) filed an application, seeking approval of a revised bill format for electric service. DP&L proposes to change its bill format to conform with the decision issued by the Public Utilities Commission of Ohio (“Commission”) in September 2013 in DP&L’s electric security plan proceedings. *In the Matter of the Application of The Dayton Power and Light Company for Approval of its Electric Security Plan, etc.*, Case Nos. 12-426-EL-SSO et al (“DP&L ESP II”). DP&L explained that, in the proposal, it eliminated charges that will no longer be charged (i.e., Transmission Related Charges and Generation Rider) and included charges for those new charges that will be introduced (i.e., Transmission Charge and Nonbypassable Charge). Additionally, DP&L stated that its new bill format “allows for an easier calculation of the price-to-compare (PTC).”

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-styled proceeding as a full party of record. Rule 4901-1-11, Ohio Administrative Code, states in part:

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.

In addition to establishment of a direct interest, the factors that the Commission considers in implementing the above rule are the nature of the intervenor’s interest, the extent that interest is 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. A review of these factors in light of following facts supports granting IGS Energy's intervention.

IGS Energy is a certified competitive retail electric service ("CRES") provider, is active in Ohio's retail electric and natural gas markets, and provides service to residential and commercial customers, including such customers in DP&L's service territory. Many of IGS Energy's customers in DP&L's service territory receive consolidated bills from DP&L that contain both DP&L's and IGS Energy's charges for electric service. IGS Energy intervened and participated in DP&L's ESP II proceedings and agrees with DP&L that there is now a need to adjust the bill format to accommodate the changes from the DP&L ESP II proceeding, particularly how Network Integrated Transmission charges are assessed and billed to retail customers regardless of whether they shop or purchase standard service power.

The specific changes proposed by DP&L are "in line" with the Commission's decision in the ESP II proceedings. Thus, IGS does not oppose DP&L's proposed changes. IGS Energy however asks the Commission, when authorizing the requested changes, to state that the DP&L ESP II format changes will not affect how DP&L will be treated in regard to the larger bill formatting issues now under discussion in the Commission's Investigation of the Retail Electric Service Market in Ohio, Case No. 12-3151-EL-COI ("COI docket"). Among other things, the stakeholders have discussed the need for bill format uniformity across Ohio, uniformity in the presentation of the price-to-compare information, and consistency among the utilities' bill language.

The billing discussions in the COI docket are ongoing. In fact, a workshop will be held by the Commission on December 11, 2013, part of which will involve bill formatting and other bill-related issues. Additionally, the Commission Staff will be issuing a report by January 16, 2014, part

of which likely will involve bill formatting and other bill-related issues. IGS Energy urges the Commission to recognize that the ongoing efforts in the COI docket should not be delayed or diminished for the Dayton area retail customers by virtue of this proposed bill format change. Any decision here regarding DP&L's pending bill format should not supersede or preclude the applicability of any future decision in the COI docket.

This motion to intervene is timely. Pursuant to Rules 4901:12-10-22(C) and 4901:1-10-33(F), Ohio Administrative Code, EDU-proposed bill formats are subject to a 45-day automatic approval process (and deemed approved on the forty-sixth day, if not otherwise acted upon by the Commission). The automatic approval time period has not expired (the 45th day is December 16, 2013). Also, IGS Energy's intervention will not unduly delay this proceeding. Lastly, no other party adequately represents the interests of IGS Energy.

WHEREFORE, based on the foregoing, IGS Energy respectfully requests that the Commission grant this motion to intervene and that IGS Energy be made a full party of record.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the following parties of record via e-mail this 6th day of December 2013.



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Summary: Motion to Intervene electronically filed by Mrs. Gretchen L. Petrucci on behalf of Interstate Gas Supply Inc. d/b/a IGS Energy