

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Vectren )	
Energy Delivery of Ohio, Inc., for Approval )	Case No. 18-0298-GA-AIR
of an Increase in Gas Rates )	

In the Matter of the Application of Vectren )	
Energy Delivery of Ohio, Inc., for Approval )	Case No. 18-0299-GA-ALT
of an Alternative Rate Plan )	

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**MOTION TO INTERVENE  
HONDA OF AMERICA, MFG., INC.**

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Pursuant to Section 4903.221, Ohio Revised Code, and Rule 4901-1-11, Ohio Adm. Code, Honda of America, Mfg., Inc., (“Honda”) respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned matters with the full powers and rights granted to intervening parties. As demonstrated in the attached Memorandum in Support, Honda has a real and substantial interest in these proceedings which may be adversely affected by the outcome herein, and which cannot be adequately represented by any other existing parties. Therefore, Honda respectfully requests that the Commission grant this motion to intervene and that Honda be made a full party of record in these proceedings.

Respectfully submitted,

/s/ M. Anthony Long  
M. Anthony Long (0037784)  
Honda North America, Inc.  
Counsel for Honda of America, Mfg., Inc.  
24025 Honda Parkway  
Marysville, OH 43040  
Telephone: (937-644-6645)  
Email: [tony\\_long@hna.honda.com](mailto:tony_long@hna.honda.com)  
(will accept e-mail service)

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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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Pursuant to Ohio Rev. Code Sec. 4903.221 and Ohio Admin. Code Sec. 4901-01-11, the Public Utility Commission of Ohio (“Commission”) should grant Honda of America, Mfg., Inc., (“Honda”) leave to intervene in these proceedings.

On March 30, 2018, The Vectren Energy Delivery of Ohio, Inc., (“VEDO”) filed an Application to Increase Rates and an Application for Approval of an Alternative Rate Plan. Honda is a large volume transportation customer of VEDO and may be adversely impacted if the modifications are approved. R.C. 4903.221 provides, in part, that any person “who may be adversely affected” by a Commission proceeding be entitled to seek intervention in that proceeding. Thus, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C 4903.221(B) requires the Commission to consider the following criteria in ruling on motions to intervene:

- (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; and
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

Honda is an active industrial customer, participated as an intervening party in VEDO’s prior Application to Increase the Rates (Case No. 07-1080-GA-AIR) and Application for Approval of an Alternative Rate Plan (Case No. 07-1081-GA-ALT), and was an active participant in the negotiations that concluded both cases. Moreover, as a large industrial user of

natural gas, Honda has a direct and substantial interest in the terms and conditions of VEDO's tariffs and tariff riders. Honda submits that its participation in this proceeding with the experience and expertise that it brings, will contribute to a just and expeditious resolution of the issues raised by the Application. Honda further submits that its intervention will not unduly delay the proceeding or unjustly prejudice an existing party. Without the ability to participate, however, Honda's interest in this proceeding will not be adequately protected by the existing parties.

In addition, Honda meets the criteria of Ohio Admin. Code 4901-1-11(A). Honda has a real and substantial interest in this proceeding and should be granted leave to intervene in order to protect its interests as a significant customer of VEDO.

For the reasons stated above, Honda respectfully requests that its Motion for Leave to Intervene be granted.

Respectfully submitted,

/s/ M. Anthony Long

M. Anthony Long (0037784)

Honda North America, Inc.

Counsel for Honda of America, Mfg., Inc.

24025 Honda Parkway

Marysville, OH 43040

Telephone: (937-644-6645)

Email: [tony\\_long@hna.honda.com](mailto:tony_long@hna.honda.com)

(will accept e-mail service)

### **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the Commission's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene and Memorandum in Support of Honda of America, Mfg., Inc.*, was sent by, or on behalf of, the undersigned counsel for Honda, to the following parties of record this 18<sup>th</sup> day of April 2018, *via* electronic transmission.

/s/ M. Anthony Long  
M. Anthony Long

### **SERVICE LIST**

[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[campbell@whitt-sturtevant.com](mailto:campbell@whitt-sturtevant.com)  
[rust@whitt-sturtevant.com](mailto:rust@whitt-sturtevant.com)  
[fdarr@mcneeslaw.com](mailto:fdarr@mcneeslaw.com)  
[mpritchard@mcneeslaw.com](mailto:mpritchard@mcneeslaw.com)  
[William.Michael@occ.ohio.gov](mailto:William.Michael@occ.ohio.gov)  
[Bryce.mckenney@occ.ohio.gov](mailto:Bryce.mckenney@occ.ohio.gov)  
[Zachary.woltz@occ.ohio.gov](mailto:Zachary.woltz@occ.ohio.gov)  
[Amy.botschner.obrien@occ.ohio.gov](mailto:Amy.botschner.obrien@occ.ohio.gov)  
[Werner.margard@ohioattorneygeneral.gov](mailto:Werner.margard@ohioattorneygeneral.gov)  
[William.wright@ohioattorneygeneral.gov](mailto:William.wright@ohioattorneygeneral.gov)  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  
[mfleisher@elpc.org](mailto:mfleisher@elpc.org)

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**Case No(s). 18-0298-GA-AIR, 18-0299-GA-ALT**

Summary: Motion to Intervene and Memorandum in Support electronically filed by Mr. M. Anthony Long on behalf of Honda of America Mfg., Inc.