

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Vectren)
Energy Delivery of Ohio, Inc. for Approval)
to Continue Its Demand Side Management) Case No. 19-2084-GA-UNC
Program for its Residential, Commercial,)
and Industrial Customers.)**

**MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Now comes the Retail Energy Supply Association (“RESA”)¹ who, pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code Rule 4901-1-11, moves to intervene in the above-styled proceeding as a full party of record. The reasons supporting the intervention are contained in the accompanying Memorandum in Support. RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record.

Respectfully Submitted,

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¹ The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE**

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

(A) 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 Public Utilities Commission of Ohio (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. *See also* R.C. 4903.221(B) upon which the above rule is authorized. A review of these factors in light of the following facts supports granting RESA’s intervention.

RESA is a broad and diverse group of knowledgeable and experienced retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than regulated utility structure. RESA members are certified as competitive retail electric and natural gas service suppliers and have been active in the Ohio retail electric and natural gas markets providing service to residential, commercial,

industrial and governmental customers. They are active in the competitive markets throughout Ohio.

In this proceeding, Vectren Energy Delivery of Ohio, Inc. (Vectren) is seeking approval to implement changes to its energy efficiency programs for a three-year period (2021-2023). Among the changes proposed is an expansion of current programs to offer installation of smart Wi-Fi thermostats, along with a mechanism through which Vectren could share in savings depending on program performance. RESA members offer smart thermostats in Ohio and Vectren's new proposal could be affect the supplier offerings.

RESA's interests are not represented by Vectren or any other party in this proceeding. RESA's motion is timely filed in accordance with the procedural schedule set by the Attorney Examiner (Entry issued January 10, 2020) and thus, RESA's participation will not unduly prolong or delay the proceedings. Additionally, RESA is knowledgeable of the market and issues involved in this proceeding and will contribute significantly to the full development and equitable resolution of the factual issues.

For all of these reasons, RESA satisfies the requirements for intervention in this Commission proceeding. RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 3rd day of February 2020 upon all persons/entities listed below:

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