

IN THE SUPREME COURT OF OHIO

NANCY S. TOLIVER,)	
)	
Appellant,)	Case No. 2013 - 1807
)	
v.)	
)	Appeal from the Public Utilities
THE PUBLIC UTILITIES)	Commission of Ohio
COMMISSION OF OHIO,)	
)	Public Utilities Commission of Ohio
Appellee.)	Case No. 12-3234-GA-CSS

VECTREN ENERGY DELIVERY OF OHIO, INC.'S
MOTION FOR LEAVE TO INTERVENE AS APPELLEE

Nancy S. Toliver
In propria persona
614 Kenilworth Avenue
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APPELLANT

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Attorney General of Ohio

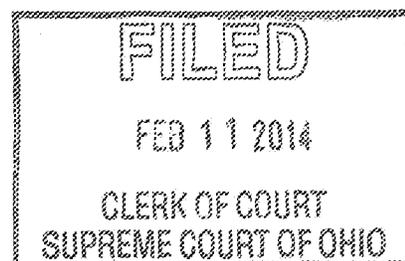
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**VECTREN ENERGY DELIVERY OF OHIO, INC.'S
MOTION FOR LEAVE TO INTEREVENE**

Vectren Energy Delivery of Ohio, Inc. (Vectren) respectfully moves for leave to intervene as an appellee in this matter. As discussed below, Vectren has a real and substantial interest in this case that is not adequately represented by any other party to this proceeding and should be permitted leave to intervene as an appellee.

This case is before this Court on the appeal by Nancy S. Toliver from the July 17, 2013 Opinion and Order, August 21, 2013 Entry on Rehearing, and October 2, 2013 Second Entry on Rehearing of the Public Utilities Commission of Ohio in Case No. 12-3234-GA-CSS. The proceedings below concerned Ms. Toliver's formal complaint alleging that Vectren had provided her unreasonable service, specifically in its administration of certain billing assistance programs overseen by the Commission. The Commission held that Ms. Toliver had not proven that Vectren provided unreasonable service to Ms. Toliver and accordingly dismissed the complaint. On appeal, Ms. Toliver contends that the Commission erred in its disposition of this case.

Vectren has a real and substantial interest in the outcome this appeal, which is not adequately represented by the Commission itself. Ms. Toliver's complaint alleged that Vectren provided service in violation of Ohio law and the Commission's rules and regulations. If Ms. Toliver is successful on appeal, Vectren could be subject to the imposition of penalties and additional, unwanted obligations. Given that this case pertains to Vectren's administration of a billing-assistance program that involves thousands of customers, an adverse ruling could impact the company's programming and administration of its billing, customer-care, and training systems. Vectren is familiar with the facts and issues of this case and is represented by experienced counsel, and its participation will not cause undue delay or unjustly prejudice any

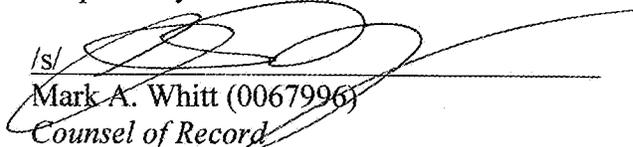
existing party. On the contrary, Vectren's participation will contribute to the just and expeditious resolution of the issues presented in this matter.

WHEREFORE, Vectren respectfully requests that this Court grant it leave to intervene as an appellee in this proceeding.

Dated: February 11, 2014

Respectfully submitted,

/s/


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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion for Leave to Intervene was served by U.S. mail

this 11th day of February 2014 to the following:

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