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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clause Contained)	Case No. 04-221-GA-GCR
Within The Rate Schedules of Columbia Gas)	
of Ohio, Inc.)	

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Purchased Gas Adjustment Clause Contained)	Case No. 05-221-GA-GCR
Within The Rate Schedules of Columbia Gas)	
of Ohio, Inc.)	

**MOTION FOR LIMITED INTERVENTION
BY
NORTH COAST TRANSMISSION COMPANY, LLC**

MOTION

Now comes North Coast Transmission Company, LLC (hereinafter North Coast) and pursuant to Section 4903.221 Revised Code and Rule 4901-1-11 of the Ohio Administrative Code moves for limited intervention in the above styled proceeding as more fully described in the following Memorandum in Support.

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

North Coast is an intrastate pipeline subject to Commission jurisdiction which interconnects interstate gas supplies from Canada and Mid Continent with four local distribution companies in Ohio, including Columbia Gas of Ohio (hereinafter Columbia), Dominion East Ohio, Orwell Natural Gas and KNG Energy¹. Most of the shippers delivering gas from North Coast to the Columbia system are competitive retail natural gas suppliers and / or aggregators. The ability of gas suppliers in general and Choice suppliers in particular to move gas from North Coast to Columbia are directly affected by the capacity assignment, balancing and banking provisions of the 2003 Stipulation.

North Coast takes no position on the Gas Cost Recovery issues. It seeks limited intervention only to the extent necessary to participate in deliberations on amending the 2003 Stipulation in general, and the specifically the provisions which address capacity assignment, levels of service, and balancing and banking.

II. North Coast Meets the Standards of Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code and the Motion to Intervene Should Be Granted.

Section 4903.221, Revised Code establishes the following items which the Commission need consider when ruling on a motion 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 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 full development and equitable resolution of the factual issues.

¹ An application is pending before the Commission to permit a new interconnection between North Coast and the Suburban Natural Gas, a local distribution company serving north central Ohio (See Case No. 07-01-PL-UNC).

To implement this statutory provision the Commission promulgated Rule 4901-1-11(B) of the Ohio Administrative Code which instructs Legal Director, the Deputy Legal Director, or the Attorney Examiner to consider:

- (1) the nature of the person's interest;
- (2) the extent to which the person's interest is represented by existing parties;
- (3) the person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and
- (4) whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

A. North Coast has a direct and substantial interest

North Coast fulfills all four of these criteria. North Coast's direct interest flows from the testimony filed by Consumers' Counsel witness Hays whose direct prepared testimony states:

I am testifying that the 2003 Stipulation is not providing the benefits that it was projected to provide to COH core customers, including both GCR and Choice customers, and thus the Commission should terminate the 2003 Stipulation².

Eliminating the 2003 Stipulation or amending the provisions addressing transportation would impact North Coast's business and the ability of its customers to move gas from North Coast to Columbia.

B. No other party represents the same interests as North Coast

There are no other upstream pipelines in the proceeding and no other party in this proceeding has the same interest as North Coast. North Coast could enhance the record by providing information that other parties could not on the limited question of upstream supply options and practical value of such options.

C. Granting the requested interventions will not unduly delay the proceeding or unjustly prejudice any existing party.

North Coast agrees to accept both the record and the procedural schedule as they stand, including the January 30th hearing date. Since its limited intervention concerning only the capacity

assignment, balancing and banking provisions of the 2003 Stipulation, North Coast participation will not slow the hearing process.

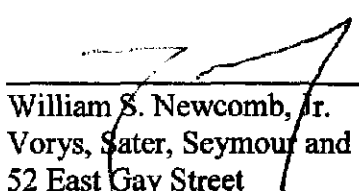
D. The Motion for Intervention is Timely Filed

OAC 4901:1-11(E) (1) requires an intervention to be filed no later than five days prior to the scheduled date of hearing. The Attorney Examiner has set the hearing date for January 30, 2007 some seven days after the filing of this pleading.

III. CONCLUSION

WHEREFORE, North Coast respectfully moves for limited intervention for the purpose of participating in any discussion of the 2003 Stipulation or provisions of that Stipulation addressing capacity assignment, levels of service, balancing and banking and related matters.

Respectfully submitted,



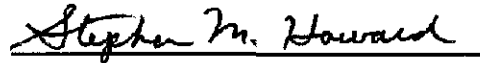
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² Direct Prepared Testimony of Bruce Hays, p. 4.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Limited Intervention was served upon the following persons via first-class U.S. mail, postage prepaid, this 24th day of January, 2007.


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