

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Approval of)
Tariffs to Recover Through An Automatic)
Adjustment Clause Costs Associated with)
the Establishment of an Infrastructure)
Replacement Program and for Approval of)
Certain Accounting Treatment)

Case No. 07-478-GA-UNC

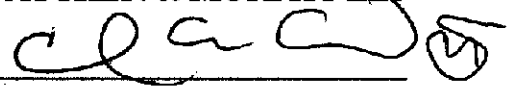
MOTION TO INTERVENE AND COMMENTS OF ABC GAS REPAIR, INC.

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code, ABC Gas Repair, Inc. ("ABC") moves to intervene in this matter for the reasons set forth in the following Memorandum in Support. Although other members of its industry have intervened, ABC has a real and substantial interest in this proceeding which is not being adequately represented by any other party. Unlike other intervenors, who arrange with independent contractors to effect repairs, ABC directly employs a staff of line repair technicians of its own. ABC seeks intervention so that it may assist in the process of implementing or commenting upon the Commission's decision of 7/11/2007 and any later proceedings.

Respectfully submitted,

CARLILE PATCHEN & MURPHY LLP

By: /s/

A handwritten signature in black ink, appearing to read 'C.A.A.', followed by a circled 'P'.

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MEMORANDUM IN SUPPORT

I. Introduction

ABC Gas Repair, Inc. ("ABC") has long provided natural gas service line warranties to its customers having been in business since 1952. ABC has its own staff who repair service lines (including to the riser). Some of its current employees have as much as 25 years of technical experience in this field. ABC customers report service line leaks or breaks, then the ABC customer service representative dispatches repair personnel and equipment to the customer's location to repair or replace the customer's natural gas service line. Because the service is generally provided under a pre-paid service and or warranty, the customer pays no fee, if the repairs are performed within the warranty period.

ABC has over fifteen thousand natural gas service line policies in place throughout Central Ohio, extending through Franklin County and into parts of Fairfield, Licking, Pickaway, Madison, Union and Delaware Counties. ABC does not subcontract its work. ABC has nineteen full time employees, including twelve service technicians in the field and a fleet of specialized service vehicles. This equipment and human capital may be entirely displaced by the current Commission decision.

II. ABC 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, established the following items which the Commission need to 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.

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

1. The nature of the person's interests;
2. The extent to which the person's interests 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.

ABC fulfills all of these criteria. Columbia seeks and the Commission looks to allow them to assume responsibility for the future maintenance, repair and replacement of customer-owned service lines and systematic replacement, over a period of approximately three years, of all risers identified as prone to leakage. ABC has thousands of warranties and contracts with natural gas service line residential customers in Ohio which would be adversely affected if the public utility were to take over such customer service lines. Customer confusion, compromise of safety, and delay will result from a rushed, "one size fits all" approach - - particularly when it will be implemented by a party which has no particular experience in this responsibility. The resolution of these matters directly effect ABC. There are no other parties in the proceeding which have the same interest as ABC. Granting the requested intervention will not unduly delay the proceeding or unjustly

prejudice any existing party.

This matter is currently being set for implementation by staff and may be subject to reconsideration, and ABC would be able to timely file its own briefs and arguments in support of that issue along with the petitioner, staff, and other intervenors.

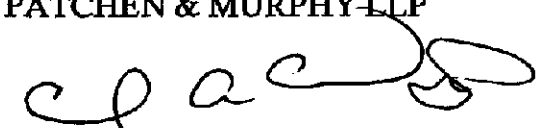
III. Conclusion

ABC Gas Repair, Inc. has a real and substantial interest in this case and should be granted intervention. Its intimate and long-standing knowledge of customer expectations, and the technical and economic issues pertaining to customer lines is invaluable. The threat to its livelihood with the proposed appropriation of its market into Columbia's rate base makes it an interested party. Its more than half century of service for this market, and its roster of seasoned professionals, makes ABC an important and necessary party for the Commission's consideration of these issues.

WHEREFORE, ABC Gas Repair, Inc. respectfully moves for intervention in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion to Intervene and Comments of ABC Gas Repair was served by regular mail, this 7th day of August, 2007, upon the following:


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