

FILE

4

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Columbia Gas of Ohio, Inc. for Approval )  
of a General Exemption of Certain Natural )  
Gas Commodity Sales Services or Ancillary ) Case No. 08-1344-GA-EXM  
Services from Chapters 4905, 4909 and )  
4935, and from Specific sections of Chapter )  
4933 of the Revised Code. )

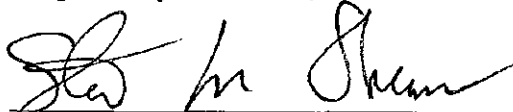
---

MOTION TO INTERVENE OF  
PROLIANCE ENERGY, LLC

---

Pursuant to Rule 4901-1-11 of the Ohio Administrative Code and R.C. 4903.221,  
ProLiance Energy, LLC ("ProLiance") respectfully seeks leave to intervene in this proceeding.  
As set forth in the accompanying Memorandum in Support, ProLiance meets the requirements  
for intervention.

Respectfully submitted,



Steven M. Sherman, Esq.  
Attorney No. 0019,053  
Krieg DeVault LLP  
One Indiana Square, Suite 2800  
Indianapolis, Indiana 46204-2079  
Telephone: (317) 636-4341  
Facsimile (317) 636-1507  
Email: ssherman@kdlegal.com  
Attorney for ProLiance Energy, LLC

RECEIVED-DOCKETING DIV

2009 FEB 10 AM 10:08

PUCO

This is to certify that the images appearing are an  
accurate and complete reproduction of a case file  
document delivered in the regular course of business.  
Technician Ann Date Processed 2/10/09

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )	
Columbia Gas of Ohio, Inc. for Approval )	
of a General Exemption of Certain Natural )	
Gas Commodity Sales Services or Ancillary )	Case No. 08-1344-GA-EXM
Services from Chapters 4905, 4909 and )	
4935, and from Specific sections of Chapter )	
4933 of the Revised Code. )	

**MEMORANDUM IN SUPPORT OF  
PROLIANCE ENERGY'S MOTION TO INTERVENE**

In support of its Motion to Intervene in this proceeding, ProLiance Energy LLC ("ProLiance") avers that it is a certified natural gas marketer in Ohio. This application requests approval of The Public Utilities Commission of Ohio ("PUCO" or "Commission") for revisions to Columbia Gas of Ohio's ("Columbia") tariff and Columbia's request to approve a wholesale auction procedure.

Columbia submits this Application pursuant to Section 4929.04, Revised Code, for approval of an exemption from the chapters and sections of the Revised Code specified in Section 4929.04, Revised Code, for the provision of all commodity sales services. This exemption will affect customers served by the following Rate Schedules: Small General Service Sales Rate, Small General Service Schools Sales Rate, General Service Sales Rate, General Service Schools Sales Rate, and Large General Services Sales Rate.

This Application is also submitted pursuant to 4929.11, Revised Code, for approval of the proposed Choice/SSO Reconciliation Rider ("CSSR"), the purpose of which is to recover or pass back the Unrecovered Gas Cost Balance and Refunds from all affected customers. This

Application is also made pursuant to Section 4905.13, Revised Code, for all applicable accounting authority necessary to implement to CSSR Rider.

Inasmuch as the proposed tariff provisions would directly impact marketers' provision of service in Ohio, ProLiance has a real and substantial interest in this proceeding that is not represented by any other party. ProLiance's participation will contribute to these proceedings, and will not cause undue delay. The test of intervention pursuant to Rule 4901-1-11 Ohio Administrative Code has been met, and, therefore, full intervention should be granted.

WHEREFORE, ProLiance moves this Commission to grant intervention in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. M. Sherman", written over a horizontal line.

Steven M. Sherman, Esq.  
Krieg DeVault LLP  
One Indiana Square, Suite 2800  
Indianapolis, Indiana 46204-2079

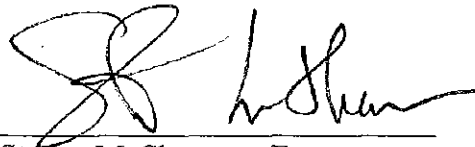
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Intervene of ProLiance Energy, LLC has been served by U.S. Mail, postage prepaid, upon Columbia Gas of Ohio and each person designated on the official service list in this proceeding on the 9 day of February, 2009.

Robert G. Kriner  
Columbia Gas of Ohio  
200 Civic Center Drive  
Columbus, OH 43215

Daniel A. Creekmur  
Columbia Gas of Ohio  
200 Civic Center Drive  
Columbus, OH 43215

Stephen Seiple  
Columbia Gas of Ohio  
200 Civic Center Drive  
Columbus, OH 43215

A handwritten signature in black ink, appearing to read 'S. Sherman', written over a horizontal line.

Steven M. Sherman, Esq.