



SEC

STAND ENERGY CORPORATION

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February 11, 2009

VIA UPS NEXT DAY AIR SAVER

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 08-1344-GA-EXM

Ladies and Gentlemen:

Enclosed for filing are an original and ten copies of Stand Energy Corporation's Motion To Intervene in the above-captioned case. Please contact me if you have any questions regarding this filing.

Sincerely,

John M. Dosker
General Counsel

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a court record document delivered in the regular course of business.
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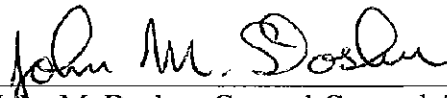
**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio)	
Inc. for Approval of a General Exemption of Certain)	Case No. 08-1344-GA-EXM
Natural Gas Commodity Sales Services or Ancillary)	
Services from Chapters 4905, 4909, and 4935 except)	
Sections 4905.10, 4935.01, and 4935.03, and from)	
Specified sections of Chapter 4933 of the Revised Code)	

**STAND ENERGY CORPORATION'S
MOTION TO INTERVENE**

Stand Energy Corporation, by and through the undersigned counsel, pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, moves the Commission for Leave to Intervene in the above-styled and numbered matter relating to an Application by Columbia Gas of Ohio for a General Exemption of Certain Gas Sales/Services from various enumerated provisions of the Ohio Revised Code. A Memorandum in Support of this motion is attached.

Respectfully submitted,



John M. Dosker, General Counsel, TA
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Specified sections of Chapter 4933 of the Revised Code)	

**MEMORANDUM IN SUPPORT OF
STAND ENERGY CORPORATION'S MOTION TO INTERVENE**

Stand Energy Corporation ("SEC"), is a Kentucky Corporation, with its primary office located at 1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629. SEC is engaged in the marketing of natural gas to numerous end use customers throughout Ohio, including industrial and commercial customers on the Columbia Gas of Ohio, Inc. system.

The grounds for this motion are that Stand Energy and the customers we represent have a real and substantial interest in this proceeding and the Commission's disposition of this proceeding without Stand Energy's participation may impair or impede Stand Energy's ability to protect the interests of its customers. Stand Energy seeks leave to intervene in this proceeding to protect our customers with gas transportation issues and to attempt to prevent any further changes or reductions to Columbia Gas of Ohio transportation services that may be discussed in this docket that would be detrimental to current Columbia transportation customers and to the competitive market for natural gas in the Columbia service territory.

Because of differing commercial goals and direction, SEC avers that no other potential participant can adequately represent its interests in this case. Pursuant to RC §4903.221 and

OAC §4901-1-11, SEC respectfully requests that the Commission grant it full Intervenor status.

For purposes of considering requests for leave to intervene, OAC 4901-1-11(A) provides that:

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.

Further, RC 4903.221 (B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

(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 merits of the case; (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

OAC 4901-1-11 (B) also provides for the following factors to be considered:

(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.

The disposition of issues without Stand Energy's participation would impair or impede Stand Energy's ability to protect its interests. No other party participating in these proceedings can adequately protect Stand Energy's interests, and accordingly, Stand Energy respectfully asserts that it would be inappropriate to resolve these issues without Stand Energy's participation. Stand Energy's interests and operational experience are substantially and directly related to these issues and the merits of this proceeding. Stand Energy's intervention will contribute to the full and equitable resolution of these matters, and will assist in the expeditious resolution of these issues. Lastly, Stand Energy's intervention will not unduly delay or unjustly prejudice any existing party.

WHEREFORE, Stand Energy Corporation respectfully submits that the Commission should grant its request to intervene in the above-referenced dockets.

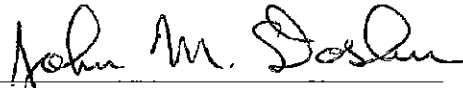
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's Motion to Intervene and Memorandum in Support was served upon the following parties of record via ordinary U.S. Mail postage prepaid on February 11, 2009.



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