

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

4
RECEIVED-DOCKETING
2009 JUN -2 PM 3:24
PUCO

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 Services from) Case No. 08-1344-GA-EXM
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.)

MOTION TO INTERVENE
OF
DTE ENERGY TRADING, INC.

Pursuant to the Attorney Examiner's Entry dated May 8, 2009, DTE Energy Trading, Inc. ("DTE Energy Trading") hereby moves to intervene in the above-captioned proceeding pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11(F). As set forth in the Memorandum in Support, DTE Energy Trading submits that it has a real and substantial interest in this proceeding, that it is so situated that the disposition of this proceeding without DTE Energy Trading's participation may impair or impede its ability to protect that interest, and that its participation in this proceeding will contribute to a just result. DTE Energy Trading further submits that its interest in this proceeding is not represented by any existing party and that granting its motion to intervene will not unduly delay this proceeding or unjustly prejudices any existing party.

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 AMJ Date Processed 6/2/09

MEMORANDUM IN SUPPORT

On January 30, 2009, Columbia Gas of Ohio, Inc. ("Columbia") filed an Application that would begin the process of Columbia's exit from the merchant function in a phased manner generally similar to the process approved for The East Ohio Gas Company d/b/a Dominion East Ohio and Vectren Energy Delivery of Ohio, Inc. The Application filed by Columbia, if granted by the Commission, will have a significant impact on DTE Energy Trading and the services that it provides. DTE Energy Trading is a wholesale supplier of natural gas to both Dominion East Ohio's and Vectren Energy Delivery of Ohio's SSO programs. As a consequence of DTE Energy Trading's familiarity with the operation of a competitively-bid standard service offer supply arrangement, it is very likely that it would participate in the Columbia program. It follows that DTE Energy Trading has a significant business interest to protect through its participation in this case.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11(F), DTE Energy Trading is a real party in interest herein, whose interest is not now represented, who can make a contribution to this proceeding and will not unduly delay the proceeding or prejudice any existing party. DTE Energy Trading submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding; that its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party; and that it agrees to be bound by record with respect to other matters previously made in the proceeding.

WHEREFORE, DTE Energy Trading respectfully requests that its motion to intervene be granted.


Respectfully submitted on behalf of
DTE ENERGY TRADING, INC.

A handwritten signature in black ink, appearing to read 'Tom O'Brien', written over a horizontal line.

Thomas J. O'Brien
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: (614) 227-2335
Facsimile: (614) 227-2390
E-mail: tobrien@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 2nd day of June 2009 *via* U.S. mail, postage prepaid.


Thomas J. O'Brien

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

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Larry Sauer
Counsel of Record
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215

Larry R. Gearhardt
Dale Arnold
Ohio Farm Bureau Federation, Inc.
280 N. High Street
P.O. Box 182383
Columbus, OH 43218-2383

Lisa G. McAlister
Joseph M. Clark
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, Ohio 43215-3927

Gary A. Jeffries
Senior Counsel
Dominion Resources Services, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817

W. Jonathan Airey
Gregory D. Russell
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008

Glenn Krassen
Bricker & Eckler
1375 East Ninth Street, Suite 1500
Cleveland, Ohio 44114

E. Brett Breitschwerdt
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215-4291