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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 a General Exemption of Certain Natural)
Gas Commodity Sales Services or)
Ancillary Services.)

Case No. 08-1344-GA-EXM

**MOTION OF SEMPRA ENERGY TRADING LLC
FOR LEAVE TO INTERVENE**

Sempra Energy Trading LLC ("SET") respectfully moves the Commission for leave to intervene in this matter pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. SET has a real, direct and substantial interest in the application filed by Columbia Gas of Ohio, Inc., and is so situated that the disposition of this proceeding may impair or impede SET's ability to protect that interest. Moreover, SET's interest in this proceeding is not adequately represented by any existing party and granting this motion to intervene will not unduly delay this proceeding or unjustly prejudice any party.

The attached memorandum sets forth more fully the reasons supporting this motion.

Respectfully submitted,



M. Howard Petricoff
Trial Counsel (0008287)
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
Columbus, Ohio 43215
614-464-5414 – telephone
614-719-4904 – facsimile
mhpetricoff@vorys.com

Stephan A. Ariyan
Associate General Counsel, Compliance
Sempra Energy Trading LLC
58 Commerce Road
Stamford, CT 06902
203-355-5494 – telephone
203-355-5410 – facsimile
Stephan.ariyan@rbssempra.com

Attorneys for Sempra Energy Trading LLC

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MEMORANDUM IN SUPPORT

I. Introduction

The Application filed by Columbia Gas of Ohio, Inc. ("Columbia"), in the matter at bar requests tariff provisions which will significantly change the way transportation services are provided on the Columbia system and the authority to implement a wholesale gas supply auction to secure gas supply to serve its sales customers. As a long standing supplier of natural gas to customers on the Columbia system, SET has a direct interest in the portion of the application that affects general transportation service. As a natural gas supplier and potential bidder, SET has a direct interest in the terms and conditions of the proposed auction.

II. Intervention

The standard for intervention is established in Rule 4901-1-11(A) which states in part:

(A) 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.

Among the factors to be considered are the nature of the intervenor's interests, the extent to which those interests are represented by existing parties, the intervenor's potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding or unjustly prejudice an existing party. *Id.* at (B). See also R.C. 4903.221(B). A review of these factors compels SET's intervention here.

SET is an active long term supplier and wholesale marketer on the Columbia system. As a long term supplier on the Columbia system, SET has a direct and substantial interest in the terms and conditions of Columbia's transportation tariffs. The tariff changes proposed in the Application directly and adversely impact that interest - including without limitation, Columbia's

proposal to implement a wholesale auction process to secure gas supply to serve its sales customers.

SET submits that its participation in this proceeding, with the experience and expertise that it brings, will contribute to a just and expeditious resolution of the issues raised by the Application. SET further submits that in light of the fact that it is seeking intervention within the time allotted by the Attorney Examiner's order, its intervention will not unduly delay the proceeding or unjustly prejudice an existing party. Without the ability to participate, however, SET's interest in these proceedings will not be adequately protected by the existing parties.

III. Conclusion

For the reasons stated above, SET respectfully requests that its Motion for Leave to Intervene be granted.

Respectfully submitted,



M. Howard Petricoff
Trial Counsel (0008287)
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
Columbus, Ohio 43215
614-464-5414 – telephone
614-719-4904 – facsimile
mhpetricoff@vorys.com

Stephan A. Ariyan
Associate General Counsel, Compliance
Sempra Energy Trading LLC
58 Commerce Road
Stamford, CT 06902
203-355-5494 – telephone
203-355-5410 – facsimile
Stephan.ariyan@rbssempra.com

Attorneys for Sempra Energy Trading LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served by regular U.S. mail, postage prepaid, or by email, where applicable, this 4th day of June, 2009, on the following:

Stephen B. Seiple
Daniel A. Creekmur
Columbia Gas of Ohio, Inc.
200 Civic Center Drive
P. O. Box 117
Columbus, OH 43216-0117
sseiple@nisource.com

Thomas O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
Tobrien@bricker.com

John Dosker
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1113
jdosker@stand-energy.com

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Ave.
Columbus, OH 43215-3927
BarthRoyer@aol.com

Lisa McAlister
McNees, Wallace & Nurik
21 East State Street, 17th Floor
Columbus, OH 43215-4228
lmcalister@mwncmh.com

Steven M. Sherman
Krieg DeVault LLP
One Indiana Square, Suite 2800
Indianapolis, IN 46204
ssherman@kdlegal.com

David C. Rinebolt
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
P. O. Box 1793
Findlay, OH 45839-1793
drinebolt@aol.com

Larry Gearhardt
Ohio Farm Bureau Federation
280 North High Street
P.O. Box 182383
Columbus, OH 43218-2383
lgearhardt@ofbf.org

Glenn Krassen
Bricker & Eckler LLP
1375 East Ninth Street, Suite 1500
Cleveland, OH 44114-1718
gkrassen@bricker.com

David Boehm
Boehm, Kurtz and Lowry
36 East 7th Street, Suite 1510
Cincinnati, OH 45202-4454
dboehm@bkllawfirm.com

Lawrence Sauer
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
sauer@occ.state.oh.us

W. Jonathan Airey
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street / P.O. Box 1008
Columbus, OH 43216-1008
wjairey@vorys.com

