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June 4, 2009

Public Utilities Commission of Ohio
Docketing Division
180 E. Broad Street
Columbus, OH 43215

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PUCO

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

Dear Clerk:

Enclosed please find an original and six copies of the Motion to Intervene on Behalf of the Communities in the Northwest Ohio Aggregation Coalition for Filing. Please return an extra file stamped copy to my attention in the postage prepaid envelope to my attention.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at my direct dial number of 419.213.4596.

Sincerely,

Lance M. Keiffer BA
Lance M. Keiffer
Assistant Prosecuting Attorney

LMK/bma

Enclosure

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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) Case No. 08-1344-GA-EXM
Exemption of Certain Natural Gas Commodity)
Sales Services or Ancillary Services)

MOTION TO INTERVENE
ON BEHALF OF THE COMMUNITIES IN THE
NORTHWEST OHIO AGGREGATION COALITION

The Cities of Maumee, Northwood, Oregon, Sylvania, Toledo, the Village of Holland, the Board of Township Trustees for Lake Township in Wood County, Ohio, and the Board of County Commissioners, Lucas County, Ohio, on behalf of the unincorporated areas of Lucas County, known collectively as the Northwest Ohio Aggregation Coalition (hereinafter "NOAC"), respectfully move the Public Utilities Commission, pursuant to Section 4903.221 of the Ohio Revised Code and Section 4901-1-11 of the Ohio Administrative Code, to grant them intervention in these proceedings for the reasons set forth in the following Memorandum in Support.

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Respectfully submitted,

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MEMORANDUM IN SUPPORT

On January 30, 2009, Columbia Gas of Ohio, Inc., filed an Application that would begin the process of Columbia's exit from the merchant function in a manner similar to that undertaken previously by The East Ohio Gas Company dba Dominion East Ohio and by Vectren Energy Delivery of Ohio, Inc. If granted, Columbia's Application would have a real, substantial and direct impact on the aggregation services provided

by NOAC to its Columbia consumers and no other party is uniquely positioned to represent NOAC's interests in this proceeding.

The nature and extent of NOAC's interest lies in the fact that it operates aggregation programs and represents over 80,000 residents and commercial businesses that are served by Columbia Gas. The Application, as filed, among other things would have a direct impact on the current CHOICE Program, would alter the definition of those that can participate in aggregation programs, and contains what Columbia itself describes as an "Aggregation Fee." These and other aspects of the Application are of direct concern to NOAC as the largest governmental aggregator within Columbia's service territory.

The City of Toledo, a NOAC Member Community, has been an active member in the Columbia Collaborative from its inception and NOAC, on behalf of all its Member Communities, has been participating in the Stakeholder Group, including the extensive discussions which preceded Columbia's filing the Application at issue herein. NOAC is knowledgeable concerning the issues surrounding the Application, intends to participate fully in these proceedings, and will retain one or more expert witnesses to further the legal positions most relevant to aggregators, residential users and commercial customers.

NOAC's participation would contribute to a proper and just resolution of these issues involved without imposing any unnecessary delay or prejudice against another party. For these reasons, NOAC requests that its Motion to Intervene be granted.

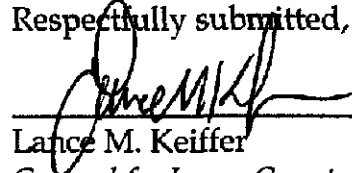
/s/ Leslie Kovacic by consent
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/s/ Sheilah McAdams by consent
Sheilah H. McAdams, Law Director
Counsel for Maumee

/s/ Paul Goldberg by consent
Paul S. Goldberg, Law Director
Counsel for Oregon

/s/ Thomas Hays by consent
Thomas R. Hays, Solicitor
Counsel for Lake Township

Respectfully submitted,


Lance M. Keiffer
Counsel for Lucas County

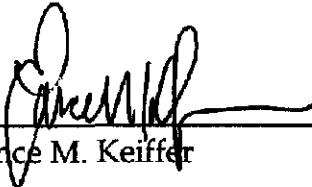
/s/ Brian Ballenger by consent
Brian J. Ballenger, Law Director
Counsel for Northwood

/s/ James Moan by consent
James E. Moan, Law Director
Counsel for Sylvania

/s/ Paul Skaff by consent
Paul Skaff, Assistant Village Solicitor
Counsel for Holland

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene with Memorandum in Support was served upon counsel for the parties of record by either placing a copy in the U.S. Mail or by transmitting a copy electronically to the addresses listed below this 4th day of June, 2009.


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