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September 3, 2010

Public Utilities Commission of Ohio
Docketing Division, 13th Floor
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 02-1683-GA-CRS

Ladies and Gentlemen:

Enclosed for filing is an original and ten (10) copies of Stand Energy Corporation's Motion To Intervene in the above-captioned case.

Please contact me if you have any questions about this filing.

Sincerely,

John M. Dosker
General Counsel

Enclosure

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 RR Date Processed 9-7-2010

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV
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In the Matter of the Application of Interstate Gas)
Supply, Inc. for Certification as a Retail Natural) Case No. 02-1683-GA-CRS
Gas Supplier.)

**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 Interstate Gas Supply, Inc. Stand Energy has real and substantial interests in this proceeding, and those interests may be adversely affected by its outcome. No other party to the proceeding can adequately represent Stand Energy's interests. Memorandum in support attached.

Respectfully submitted,



John M. Dosker, General Counsel, TA
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Interstate Gas)
Supply, Inc. for Certification as a Retail Natural) Case No. 02-1683-GA-CRS
Gas Supplier.)

**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 has 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 its interests. Stand Energy seeks leave to intervene in this proceeding to protect our interests in maintaining an active, competitive, retail natural gas market in Ohio. The request by IGS to allow it to use the name "Columbia Retail Energy" would harm Ohio's competitive retail natural gas market.

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:

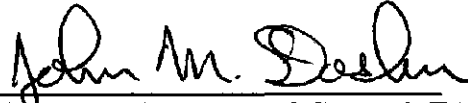
(1) The nature of the person's interest; (2) The extent to which the person's interest is represented by existing parties; (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

Stand Energy respectfully asserts that it would be inappropriate to resolve these issues without Stand Energy's participation. Stand Energy's 25 years experience marketing natural gas in Ohio are substantially and directly related to the competitive issues presented in this case.

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. As a natural gas marketer, Stand Energy has an interest in protecting the reputation of Ohio's Retail Natural Gas Market, which Stand Energy believes would be put at risk if the IGS proposal - to be allowed to use the Columbia Retail Energy trade name - is allowed by the Commission.

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 were served upon the following parties of record via ordinary U.S. Mail postage prepaid on September 3, 2010.

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