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Before
The Public Utilities Commission of Ohio

OCT -5 AM 9:50

In the Matter of the Application)
of Interstate Gas Supply, Inc. for)
Certification as a Retail Natural)
Gas Supplier)

PUCO

Case No. 02-1683-GA-CRS

Motion to Intervene of the Ohio Farm Bureau Federation

Now comes the Ohio Farm Bureau Federation (OFBF) pursuant to Section 4903.221 of the Ohio Revised Code (ORC) and Rule 4901-1-11 of the Ohio Administrative Code (OAC), and moves for intervention in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth in the accompanying memorandum of support.

Wherefore, for the reasons stated below, OFBF requests that its motion for intervention be granted and that it be made a full party of record.

Respectfully Submitted,

Larry Gearhardt

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The Public Utilities Commission of Ohio**

**In the Matter of the Application)
of Interstate Gas Supply, Inc. for)
Certification as a Retail Natural)
Gas Supplier)**

Case No. 02-1683-GA-CRS

**Memorandum in Support of Motion to Intervene
of the Ohio Farm Bureau Federation**

Pursuant to Section 4903.22.1, ORC and Rule 4901-1-11, ORC, OFBF moves for intervention in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth herein.

Accordingly, Rule 4901-1-11 of the OAC states in part:

Upon timely motion, and person shall be permitted to Intervene in a proceeding 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 particular matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Included as factors to be considered are the nature of the intervener's interests, the extent net those interests are represented by existing parties, the intervener's potential contribution to the resolution of issues and whether intervention would result in undue delay of the proceeding. Similar provisions are detailed in Section 4903.22.1(B), ORC.

The Ohio Farm Bureau Federation (OFBF) and its member county Farm Bureaus maintain a non-profit organization representing agricultural interests at the state and local levels. Over 230,000 member families belong to the organization. Some Farm Bureau members engage in a variety of industrial activities - food processing, commodity

processing/conditioning/handling, biofuel production and general manufacturing. Other members engage in mercantile enterprises – farms, agribusiness support, feed processing, grain conditioning and green house operation. Some members are involved in small business enterprises – restaurants, cleaners and other services. Moreover, many are residential energy consumers. In short, many of Farm Bureau's members in rural, suburban and residential neighborhoods are served by Columbia Gas of Ohio (COH).

OFBF represents a diverse group of industrial, mercantile, small business and residential energy consumers employing both General Transportation Service (GTS) provisions and CHOICE program requirements to create strategies to control their energy costs. Over the past two decades the organization has worked with COH, the Public Utilities Commission of Ohio (PUCO), the Ohio Consumers Counsel (OCC), energy service providers, natural gas marketers, and other groups representing industrial, mercantile and residential consumers in key collaborative and stakeholder advisory groups. These efforts have helped create and/or redesign COH's GTS and CHOICE programs, as well as promoted aggregation and group purchasing benefits.

Changes being considered by COH approved natural gas marketer, Interstate Gas Service (IGS) as recently contemplated in this docket, and the consequent impact of these changes could dramatically impact the ability for some Farm Bureau members to perceive, differentiate and/or compare CHOICE program service offerings between the utility and approved independent service providers. This situation could cause additional consumer confusion and concern as the utility transitions from a Gas Cost Recovery (GCR) program to its new Standard Service Offer (SSO) and Standard Choice Offer (SCO) formats in 2012-13. Any confusion concerning the status, affiliation and/or ownership of a potential service provider could be detrimental for consumers as they compare service offerings, use collaboration and/or create additional programs and new tools to help them control their energy costs.

OFBF leaders will be able to share their program experiences and unique perspectives with the Commission as it works with other interested parties to develop effective outcomes for this case. Moreover, OFBF's participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party and will contribute to the just and quick resolution of issues and concerns raised.

Given the diverse, yet unique energy needs of its members, experience, technical interests and support for effective GTS and CHOICE program development, the Ohio Farm Bureau Federation submits that good cause exists to grant it leave for intervene in this proceeding.

Wherefore, for the means explained above, the Ohio Farm Bureau Federation requests that its motion for intervention be granted and that it be made a full party of record.

Respectfully Submitted,



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Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 5th day of OCTOBER —, 2010 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.



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