

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Audit of the Transportation)
Migration Rider – Part B of The East Ohio)
Gas Company d/b/a Dominion East Ohio.) Case No. 17-219-GA-EXR

In the Matter of the Audit of the Uncollectible)
Expense Rider of The East Ohio Gas)
Company d/b/a Dominion East Ohio.) Case No. 17-319-GA-UEX
)

In the Matter of the Audit of the Percentage)
of Income Payment Plan Rider of The East)
Ohio Gas Company d/b/a Dominion East Ohio.) Case No. 17-419-GA-PIP

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to Ohio Revised Code §4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute, or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Ohio Revised Code, and the Commission’s Code of Rules and Regulation contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced dockets concern the Commission’s audits of certain cost-recovery riders of The East Ohio Gas Company d/b/a Dominion East Ohio (“Dominion”).

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in these matters.

OPAE is an Ohio corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in these matters. Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by

the matters.¹ Moreover, many of OPAE's members are Community Action Agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, Community Action is charged with advocating for low-income residents of their communities.

OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of Dominion. OPAE members are also ratepayers of Dominion. Therefore, OPAE has an interest in these proceedings that will audit the above-named cost-recovery riders of Dominion. OPAE's primary interest in these cases is to protect the interests of low and moderate income customers and OPAE members whose rates and provision of service may be affected by these audits.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede the ability of OPAE to protect its interests. No other party to the matters will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate, service provider and nonprofit customer group. No other party represents this group of interests. OPAE's participation in these matters will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by these cases. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom may be affected by the outcome of these audits.

Therefore, OPAE is entitled to intervene in these matters with the full powers and rights granted by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served electronically by the Commission's Docketing Division upon the persons identified below who are electronically subscribed to these cases on this 3rd day of July 2017.

Colleen L. Mooney
Colleen L. Mooney

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Summary: Motion to Intervene and Memorandum in support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy