

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Northeast Ohio Natural Gas Corp. for an	)	Case No. 18-1720-GA-AIR
Increase in Gas Distribution Rates.	)	
In the Matter of the Application of	)	
Northeast Ohio Natural Gas Corp. for	)	Case No. 18-1721-GA-ATA
Tariff Approval.	)	
In the Matter of the Application of	)	
Northeast Ohio Natural Gas Corp. for	)	Case No. 18-1722-GA-AAM
Approval of Certain Accounting Authority.	)	

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

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Ohio Partners for Affordable Energy ("OPAE") respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters pursuant to Revised Code Section 4903.221 and Rule 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 in support attached hereto and incorporated herein.

Respectfully submitted,

/s/Colleen Mooney  
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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters pursuant to Section 4903.22.1, Revised Code, and the Commission’s Code of Rules and Regulations contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced applications made by Northeast Ohio Natural Gas Corp. (“Northeast”) request an increase in gas distribution rates, tariff approval, and approval of certain accounting authority.

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 non-profit 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 in which Northeast seeks an increase in gas distribution rates, tariff approval, and certain accounting authority.

Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by the applications.<sup>1</sup> 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 Agencies are charged with advocating for low-income residents of their communities. OPAE also provides essential services in the form of bill payment assistance programs and has provided weatherization and energy efficiency services to low-income customers of Northeast.

OPAE's primary interest in these cases is to protect the interests of low and moderate-income customers of Northeast whose rates and provision of service will be affected by these applications. OPAE seeks to address any issues as may arise during consideration of these matters. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of these cases.

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 nonresidential 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 applications.

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.

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<sup>1</sup> A list of OPAE members can be found on the website: [www.ohiopartners.org](http://www.ohiopartners.org).

Respectfully submitted,

/s/Colleen L. Mooney

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(will accept service by e-mail)

## **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 parties identified below on this 3rd day of January 2019.

/s/Colleen L. Mooney  
Colleen L. Mooney

## **SERVICE LIST**

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/3/2019 11:45:32 AM**

**in**

**Case No(s). 18-1720-GA-AIR, 18-1721-GA-ATA, 18-1722-GA-ALT**

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