

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East       )  
Ohio Gas Company d/b/a Dominion East Ohio   )  
to Adjust its Pipeline Infrastructure Replacement) Case No. 18-1587-GA-RDR  
Cost Recovery Charge and Related Matters.    )

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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 matter pursuant to Ohio Revised Code ("R.C.") §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 attached hereto and incorporated herein.

Respectfully submitted,

/s/Colleen Mooney  
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Ohio Gas Company d/b/a Dominion East Ohio    )  
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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 this matter pursuant to Section 4903.22.1, Revised Code, and the Commission’s Code of Rules contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application of The East Ohio Gas Company d/b/a Dominion East Ohio’s (“Dominion”) seeks to adjust Dominion’s Pipeline Infrastructure Replacement (“PIR”) cost recovery charge.

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 this matter.

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 this matter, which will adjust Dominion’s PIR charge. Additionally, OPAE includes as members non-profit organizations

located in the service area that will be affected by the application.<sup>1</sup> 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 Agencies are charged with advocating for low-income residents of their communities.

OPAE members also provide 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 non-residential ratepayers of Dominion. Therefore, OPAE has an interest in this proceeding that will consider Dominion's application to adjust its PIR cost recovery charge.

For the above reasons, OPAE has a direct, real and substantial interest in this matter. The disposition of this matter may impair or impede the ability of OPAE to protect its interests. No other party to the matter will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate and service provider for low-income customers as well as being a non-residential customer group. No other party represents this group of interests. OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to a just and expeditious resolution of the issues raised by this case. 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 this case.

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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).

Therefore, OPAGE is entitled to intervene in this matter 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.

Respectfully submitted,

/s/Colleen Mooney

Colleen L. Mooney

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## **CERTIFICATE OF SERVICE**

A copy of this Motion to Intervene and Memorandum in Support will be served electronically by the Commission's Docketing Division upon the parties of record who have accepted to receive electronic service on this 9th day of January 2019.

/s/Colleen Mooney  
Colleen L. Mooney

## **SERVICE LIST**

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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