

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Columbia Gas of Ohio Inc.'s)	
Letter of Notification regarding the)	Case No. 19-2148-GA-BLN
Marysville Connector Pipeline Project)	
in Union County, Ohio.)	

**PETITION FOR LEAVE TO INTERVENE
OF
THE LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS**

Pursuant to Ohio Revised Code Section 4906.08(A)(3) and Ohio Administrative Code Rule 4906-2-12(A)(2), the Logan County Board of County Commissioners (the “Commissioners”) file this petition for leave to intervene in this proceeding. The reasons supporting this intervention request are set forth in the accompanying Memorandum in Support.

WHEREFORE, the Commissioners respectfully request that the Ohio Power Siting Board grant this petition for leave to intervene in this proceeding.

Respectfully submitted,

/s/ Eric Stewart
Logan County Prosecutor
117 E. Columbus Ave. 2nd Floor
Bellefontaine, OH 43311
937-593-3755
937-599-7271 (fax)
eric@co.logan.oh.us
Attorney for the Logan County Board of County Commissioners

**MEMORANDUM IN SUPPORT OF
THE LOGAN COUNTY BOARD OF COUNTY COMMISSIONERS
PETITION FOR LEAVE TO INTERVENE**

Pursuant to Ohio Revised Code Section (“R.C.”) 4906.08, a person may petition the Ohio Power Siting Board (“Board”) for leave to intervene in proceedings such as this one within 30 days after the date of publication of the notice required by R.C. 4906.06(C). Furthermore, with accelerated applications to the Board, a person may petition the Board for leave to intervene in proceedings such as this one within 10 days after the newspaper publication announcing the Letter of Notification by an applicant. The newspaper announcement by Columbia Gas of Ohio Inc (“Columbia”) occurred on December 23rd. The Commissioners timely file this petition for leave to intervene in this matter.

Ohio Administrative Code Rule 4906-2-12(B) states that the petitions for leave to intervene shall be granted upon a showing of good cause and states that the following may be considered in that analysis:

- (a) The nature and extent of the person's interest.
- (b) The extent to which the person’s interest is represented by existing parties.
- (c) The person’s potential contribution to a just and expeditious resolution of the issues involved in the proceeding.
- (d) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.

In this matter, on December 20, 2019 Columbia filed a Letter of Notification for intent to construct a proposed 4.78 mile natural gas pipeline known as the Marysville Connector Pipeline Project (the “Project”) with the stated purpose of providing “natural gas service to new industries

and residential development along the route.”¹ This Project is part of a larger Columbia plan to bring additional natural gas supply from the east side of Columbus up through Delaware County and back down into southeastern Union County. This larger plan is proposed to bring regional benefit to surrounding communities. In addition to Delaware County, Union, Madison, and Logan Counties are all currently facing significant natural gas capacity issues.

The Commissioners are the primary local governing body representing the interests of the roughly 45,000 Logan County residents and our overall community’s economic wellbeing. The Commissioners are focused on continuing to create an environment in Logan County that is conducive for our existing industry to grow and for the attraction of new industry and residential development to the area.

The Commissioners take interest in this proceeding as they have become informed that Logan County faces significant natural gas capacity issues. A lack of sufficient natural gas capacity will continue to hinder future growth in Logan County as development is generally attracted to locations that provide the lowest amount of risk, lowest cost, and fastest speed to project completion. A local natural gas distribution company Vectren, a CenterPoint Energy Company, shared at the PUCO Natural Gas forum on November 7th, 2019 that “Interstate pipelines serving Vectren’s rural service territory are fully subscribed” and that “Vectren cannot obtain additional supplies to serve new load in these areas”². Both Columbia and Vectren provide natural gas service to portions of Logan County, with both companies obtaining their gas supplies from the same fully subscribed interstate pipelines.

¹ Letter of Notification, page 2 section (B)(1)

² PUCO Natural Gas Forum, Vectren presentation page 8 -

<https://www.puco.ohio.gov/index.cfm?LinkServID=BC0E4A2B-5056-8052-5175BE93E5C06EB3>

As such, the Commissioners have an interest in this Project including whether it will provide a long-term regional solution benefiting areas such as Logan County that although are beyond the immediate Project locale southeast of Marysville, are contiguous and will be impacted by the development of this Project (as well as Columbia's larger announced plan).

The Commissioners will bring unique experience to the proceeding having the greatest local knowledge of growth corridors in the county, knowledge of additional infrastructure investments outside of natural gas that will drive future development, and the voice of local industry through its economic development operations. The Commissioners not only can contribute to a just and expeditious resolution of the issues involved in the proceeding, its participation will not unduly delay the proceeding or unjustly prejudice an existing party. The Commissioners have a unique perspective, extensive infrastructure development experience and extensive local knowledge, all of which can assist the Board in its consideration of this matter, including whether the Project is in the public interest and whether the Project meets the current and future needs of a region with constrained natural gas capacity.

For these reasons, intervention is reasonable, good cause has been established, and the Commissioners' petition for leave to intervene should be granted.

Respectfully submitted,

/s/ Eric Stewart

Logan County Prosecutor
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Bellefontaine, OH 43311
937-593-3755
937-599-7271 (fax)
eric@co.logan.oh.us

Attorney for the Logan County Board of County Commissioners

CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) or otherwise via U.S. regular mail on this 2nd day of January 2020 upon all persons/entities listed below:

Joseph M. Clark
Stephen Seiple
P.O. Box 117
290 W. Nationwide Blvd.
Columbus, Ohio 43216
josephclark@nisource.com
sseiple@nisource.com

/s/ Eric Stewart

Eric Stewart, Logan County Prosecutor

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Case No(s). 19-2148-GA-BLN

Summary: Petition Petition for Leave to Intervene of the Logan County Board of County Commissioners electronically filed by Mr. Eric C Stewart on behalf of Logan County Board