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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
COLUMBIA GAS OF OHIO, INC. to )  
Establish the Columbia Customer )  
Choice Program )

Case No. 96-1113-GA-ATA

**MOTION TO INTERVENE**  
**COLUMBIA ENERGY SERVICES, INC.**

**RECEIVED**  
NOV 06 1996  
DOCKETING DIVISION  
Public Utilities Commission of Ohio

NOW COMES Columbia Energy Services Corporation.

the Public Utilities Commission of Ohio ("Commission") grant it intervention pursuant to Ohio Revised Code ("Revised Code") Section 4903.22.1 and Ohio Administrative Code ("O.A.C.") Section 4901-1-11 and as a customer of Columbia Gas of Ohio, Inc. ("Columbia"). CES' business will be affected by the Commission's final order in this proceeding. The reasons for intervention are set out in more detail in the Memorandum in Support below.

**MEMORANDUM IN SUPPORT**

CES is a customer of Columbia and also participates in its firm and interruptible transportation programs as an agent on behalf of its non residential customers who are located within Columbia's service area. Columbia proposes to institute a residential program in which CES plans to participate as a natural gas marketer. CES has already engaged in substantial planning efforts in anticipation of the Toledo residential program and it has also incurred significant financial obligations in preparation for its

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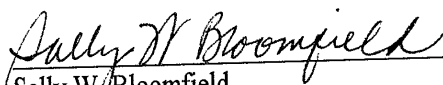
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participation. CES seeks to participate in this proceeding in order to protect its customers' and its own interests. No other party can adequately represent the interests of CES. Each gas marketing company has different approaches to its operations and though there may be issues that some of the gas marketing companies may have in common, each one has different resources, different price structures and different marketing objectives, all of which will be differently affected by the results of this proceeding.

CES intends that its participation will not unduly delay or prolong this proceeding. As the largest participant in a residential natural gas transportation in Pennsylvania (one of the few residential gas transportation programs in the country), CES' participation in this proceeding will assist the Commission in developing the record. Therefore, CES asserts that its participation as an intervenor will significantly contribute to the full development and equitable resolution of the residential transportation issues in this proceeding.

For the above reasons, the CES requests that the Commission grant its intervention.

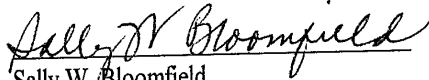
Respectfully submitted on behalf of  
COLUMBIA ENERGY SERVICES CORPORATION

  
Sally W. Bloomfield  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene of Columbia Energy Services Corporation has been served upon the following parties listed below by hand delivery, fax or regular U.S. mail, postage prepaid, this 6th day of November, 1996.

Amy L. Koncelik  
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Sally W. Bloomfield