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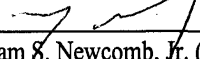
BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Authority to)	Case No. 94-987-GA-AIR
Amend Filed Tariffs to Increase Rates and)	
Charges for Gas Service)	
In the Matter of the Application of Columbia)	
Gas of Ohio, Inc. to Establish the Columbia)	Case No. 96-1113-GA-ATA
Customer Choice Program)	
Application of Columbia Gas of Ohio, Inc. to)	
Revise its Tariffs to Establish a New Gas)	Case No. 03-1459-GA-ATA
Transfer Service)	

**MOTION TO INTERVENE ON A LIMITED BASIS BY
NORTH COAST GAS TRANSMISSION, LLC**

Now comes North Coast Gas Transmission, LLC (NCGT) pursuant to
Rules 4901-1-11 of the Ohio Administrative Code, and for the reasons set forth in the attached
memorandum in support, moves for leave to intervene on a limited basis in the above styled
proceedings.

Respectfully submitted,

By: 
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MEMORANDUM IN SUPPORT

On October 9, 2003, Columbia Gas of Ohio filed in the above styled dockets a Stipulation amending its future operation of the Choice and general transportation programs for the period 2004 through 2010. NCGT's 425 pipeline is physically interconnected with the Columbia Gas of Ohio's system at Findlay, Ohio and at Hinckley Township, Ohio. Natural gas transportation service is now conducted, via the KNG Energy system with Columbia Gas of Ohio using the 425 pipeline which NCGT leases to KNG to permit KNG and Columbia to provide the service. To meet the growing demand for transport through the 425 pipeline, NCGT has added two compressor stations¹ which will permit substantially more natural gas volumes to flow through the 425 line to both constrained and non constrained Columbia Gas of Ohio city gates.

North Coast has held several discussions with Columbia of Ohio regarding increased access to its system as a result of requests from retail marketers serving customers in Columbia of Ohio market areas who desire diversity of supply and access to gas supply sources available through the NCGT system. Though the subject of upstream capacity from Columbia Transmission facilities is discussed in the October 9, 2003 filing, the topic of intrastate and local distribution interconnection and capacity is not addressed. NCGT wishes to intervene for the limited purpose of presenting information on intrastate and local distribution interconnection and capacity availability for the period 2004 through 2010. NCGT believes that information on the availability and access to intrastate and local distribution capacity is required in order for the Commission to make a fully informed decision on the proposed Stipulation.

Section 4903.221(B), Revised Code, sets forth certain criteria for the Commission's consideration in deciding whether to grant a request for intervention. Those criteria are:

¹ Certificates granted by the Ohio Power Siting Board in Case No. 02-2969-GA-BLN

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding; and
- (4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

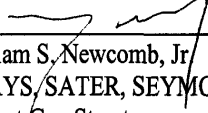
Rule 4901-1-11(B) of the Ohio Administrative Code provides that any person may be permitted to intervene in a proceeding upon a showing that the person has a real and substantial interest in the proceeding. In deciding whether to permit an intervention, the Commission may consider the following criteria:

- (1) The nature of the person's interest;
- (2) The extent to which the person's interest is represented by existing parties;
- (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceedings; and
- (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

As noted above, as the lessor of the 425 pipeline an essential element for preservation of competitive transportation services to Ohio consumers, NCGT has a direct pecuniary interest in policies that may affect the access to gas supply sources and availability of suppliers for retail and transportation customers who desire to move gas over the 425 pipeline into the Columbia system. This interest is not and cannot be represented by any other party in the proceeding. Information on the availability of intrastate and local distribution company interconnections and upstream capacity would be critical for the Commission when it reviews the proposed transportation programs presented in Stipulation filed on October 9, 2003. Since no hearing has been set, nor any discovery conducted, NCGT intervention shall not delay the proceedings.

WHEREFORE, NCGT requests the Commission grant it limited intervention to present information and its opinion on intrastate and local distribution interconnections with Columbia Gas of Ohio.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served upon the following
parties of record by first class U.S. mail, postage prepaid, this 24th day of October, 2003:

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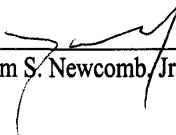
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