

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval of)	Case No. 17-2202-GA-ALT
an Alternative Form of Regulation.)	

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

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matter pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code Rule 4901-1-11 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
Colleen L. Mooney
Reg. No. 0015668
Ohio Partners for Affordable Energy
P.O. Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@ohiopartners.org
(electronically subscribed)

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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this matter pursuant to Section 4903.22.1, Ohio Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application made by Columbia Gas of Ohio, Inc. (“Columbia”) requests approval of an alternative form of regulation in the form of an alternative rate plan to establish a capital expenditure program rider (“CEP Rider”). The purpose of the CEP Rider is to recover post-in-service carrying costs, incremental depreciation expense, and property tax expense currently deferred pursuant to Columbia’s capital expenditure program as well as the corresponding assets to which these expenses are directly attributable in the capital expenditure program.

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. Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected

by the application.¹ 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 also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of Columbia. Some OPAE members are non-residential ratepayers of Columbia.

OPAE's primary interest in this case is to protect the interests of low- and moderate-income residential customers and OPAE members whose provision of natural gas distribution service will be affected by this application. 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 application.

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, service provider and non-profit, 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 the just and expeditious resolution of the issues raised by this application.

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

Therefore, OPAE 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/s Colleen Mooney

Colleen L. Mooney

Reg. No. 0015668

Ohio Partners for Affordable Energy

PO Box 12451

Columbus, OH 43212-2451

Telephone: (614) 488-5739

cmooney@ohiopartners.org

(electronically subscribed)

CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served by the Commission's Docketing Division electronically upon the persons who are electronically subscribed to this case on this 13th day of December 2017.

/s/Colleen Mooney
Colleen L. Mooney

SERVICE LIST

sseiple@nisource.com
josephclark@nisource.com
egallon@porterwright.com
mstemm@porterwright.com
etaylor@porterwright.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
william.wright@ohioattorneygeneral.gov