

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Columbia)
Gas of Ohio, Inc. for Authority to Implement a)
New Service for Cooperatives)

Case No. 05-1045-GA-ATA

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COMMENTS REGARDING
SUPPLEMENT TO APPLICATION OF COLUMBIA GAS OF OHIO, INC.

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Madison Energy Cooperative Association, Inc.

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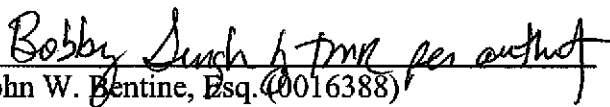
The Knox Energy Cooperative Association, Inc., Village Energy Cooperative Association, Inc., and Madison Energy Cooperative Association, Inc. (collectively "Cooperatives") are engaged in the business of supplying natural gas to their members within the State of Ohio. The Cooperatives are member-owned, not-for-profit natural gas utilities that are operated exclusively for their members. In accordance with RC §§ 4905.02 and 4905.04, the Cooperatives provide non-jurisdictional services to their members.

On September 14, 2005, the Cooperatives filed a motion to intervene, comments protesting the August 22, 2005, Application filed by Columbia Gas of Ohio, Inc. ("Columbia"), and requested that the application be set for hearing (the "intervention and protest"). Columbia's application proposes to implement a new service to "standardize" the provision of natural gas transportation service, and related rates and conditions for such service, to cooperatively-owned natural gas utilities. Columbia has entitled this proposed service as the "Full Requirements Cooperative Transportation Service" or "FRCTS." In their intervention and protest, the Cooperatives noted that the proposed service may provide them with some benefits; however, the Cooperatives also noted that the application would materially and adversely impact the Cooperatives in a number of respects, enumerated in the Cooperatives intervention and protest.

Since the filing of the Cooperatives' intervention and protest, Columbia and the

Cooperatives have engaged in extensive discussions relating the Cooperatives' concerns with the proposed application. As a result of those discussions, on November 17, 2006, Columbia filed a supplement to the application, along with tariff sheets, with modify Columbia's application. While the supplement does not reflect the Cooperatives' positions had the application been fully litigated, the Cooperatives appreciate that the Commission's approval of the application, as amended by the supplement, would formally impose on Columbia an obligation to provide service to cooperatives pursuant to a Commission-approved tariff service. Accordingly, the Cooperatives respectfully request the following: (i) that the Commission to approve the proposed application, as amended by the supplement; (ii) the Commission expressly note that Columbia has an obligation to provide service to cooperatives, generally, and to order Columbia to provide service to the Cooperatives pursuant to the application, as amended by the supplement; and, (iii) grant the Cooperatives intervention in this docket, so that the Cooperatives may fully participate in this docket and receive the protection and benefits accorded to parties in a proceeding.

Respectfully submitted,


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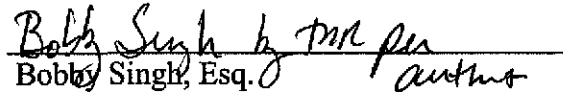
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**Attorneys for Knox Energy Cooperative Association,
Inc., Village Energy Cooperative Association, Inc., and
Madison Energy Cooperative Association, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on December 5, 2006.


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