

**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 Approval of Tariffs to )  
Recover Through an Automatic Adjustment )  
Clause Costs Associated with the )  
Establishment of an Infrastructure )  
Replacement Program and for Approval )  
of Certain Accounting Treatment )

Case No. 07-478-GA-UNC

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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF INDUSTRIAL ENERGY USERS-OHIO**


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Samuel C. Randazzo (Trial Attorney)  
Gretchen J. Hummel  
Lisa G. McAlister  
Daniel J. Neilsen  
Joseph M. Clark  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>TH</sup> Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
sam@mwncmh.com  
ghummel@mwncmh.com  
lmcalister@mwncmh.com  
dneilsen@mwncmh.com  
jclark@mwncmh.com

**July 2, 2007**

**Attorneys for Industrial Energy Users-Ohio**

(C23530:)

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**MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO**

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Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On April 25, 2007, Columbia Gas of Ohio ("COH") filed an application proposing an Infrastructure Replacement Program ("IRP"), which consists of an automatic adjustment mechanism that would compensate COH for the costs associated with the Commission-ordered service riser inventory and identification process, the replacement of customer-owned service risers prone to failure, and the replacement of customer-owned service lines constructed or installed by COH as risers or service lines are replaced. COH is also requesting accounting authority to capitalize its investment in the customer-owned service lines and risers and to defer related costs for subsequent recovery through the automatic adjustment mechanism.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of IEU-Ohio will not be adequately represented by other parties to the proceedings and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

  
\_\_\_\_\_  
Samuel C. Randazzo (Trial Attorney)  
Gretchen J. Hummel  
Lisa G. McAlister  
Daniel J. Neilsen  
Joseph M. Clark  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>TH</sup> Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
sam@mwncmh.com  
ghummel@mwncmh.com  
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dneilsen@mwncmh.com  
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**MEMORANDUM IN SUPPORT**

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In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at [http://www.ieu-ohio.org/public/about\\_ieu-ohio/members](http://www.ieu-ohio.org/public/about_ieu-ohio/members). IEU-Ohio's members work together to address matters that affect the availability and price of utility services.

IEU-Ohio's members purchase substantial amounts of natural gas and related services from COH, which is a public utility subject to the jurisdiction of the Commission. IEU-Ohio member company facilities are served on the tariffs from which COH proposes to recover IRP charges, including the general transportation service ("GTS") tariff.

Therefore, IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of natural gas service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in these proceedings is the result of the effect that these proceedings shall have upon the price, adequacy, and reliability of the natural gas supply and related services within Ohio, including the areas presently served by COH.

Respectfully submitted,



Samuel C. Randazzo (Trial Attorney)

Gretchen J. Hummel

Lisa G. McAlister

Daniel J. Neilsen

Joseph M. Clark

MCNEES WALLACE & NURICK LLC

Fifth Third Center

21 East State Street, 17<sup>th</sup> Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

ghummel@mwncmh.com

lmcaster@mwncmh.com

dneilsen@mwncmh.com

jclark@mwncmh.com

July 2, 2007

**Attorneys for Industrial Energy Users-Ohio**

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion to Intervene of Industrial Energy Users-Ohio* and *Memorandum in Support* were served upon the following parties of record this 2nd day of July 2007, via first class mail, postage prepaid.

  
\_\_\_\_\_  
Joseph M. Clark

Stephen B. Seiple  
Mark Kempic  
Kenneth W. Christman  
200 Civic Center Drive  
Columbus, Ohio 43216-0017

**ON BEHALF OF COLUMBIA GAS OF OHIO,  
INC.**

David C. Rinebolt  
Colleen L. Mooney  
231 West Lima Street  
P.O. 60x1793  
Findlay, OH 45839-1793

**ON BEHALF OF OHIO PARTNERS FOR  
AFFORDABLE ENERGY**

Janine L. Migden-Ostrander  
Joseph P. Serio  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485

**ON BEHALF OF THE OFFICE OF OHIO  
CONSUMERS' COUNSEL**

Stephen M. Howard  
Howard Petricoff  
Vorys, Sater Seymour & Pease  
52 E. Gay Street  
Columbus, Ohio 43216-1008

**ON BEHALF OF UTILITY SERVICE  
PARTNERS, INC.**

Vincent A. Parisi  
5020 Bradenton Ave.  
Dublin OH 43017

John W. Bentine, Esq.  
Bobby Singh, Esq.  
Chester, Willcox & Saxbe LLP  
65 E. East State Street, Suite 1000  
Columbus, Ohio 43215-4213

**ON BEHALF OF INTERSTATE GAS SUPPLY,  
INC.**

Steve Puican  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

**ON BEHALF OF THE PUBLIC UTILITIES  
COMMISSION OF OHIO**