

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV
2008 MAR 14 PM 4:49
PUCO

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Services and Related Matters.)	Case No. 08-0072-GA-AIR
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation and for a Change in its Rates and Charges.)	Case No. 08-0073-GA-ALT
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.)	Case No. 08-0074-GA-AAM
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Revise its Depreciation Accrual Rates.)	Case No. 08-0075-GA-AAM

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

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

March 14, 2008

Attorneys for Industrial Energy Users-Ohio

{C25294:}

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician TM Date Processed 3/14/2008

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Services and Related Matters.)))))	Case No. 08-0072-GA-AIR
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation and for a Change in its Rates and Charges.))))	Case No. 08-0073-GA-ALT
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.)))	Case No. 08-0074-GA-AAM
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Revise its Depreciation Accrual Rates.)))	Case No. 08-0075-GA-AAM

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

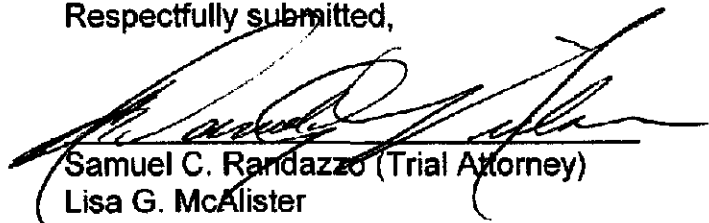
Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted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

On February 1, 2008, Columbia Gas of Ohio ("COH") submitted a pre-filing notice ("PFN") of intent to file an application to increase distribution rates for natural gas service. In its PFN, COH described its proposed rate increase, previewed an alternative

rate plan proposal, and explained its request for approval to change its accounting methods and revise its depreciation accrual rates.

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)

Lisa G. McAlister

Daniel J. Neilsen

MCNEES WALLACE & NURICK LLC

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

lmcAlister@mwncmh.com

dneilsen@mwncmh.com

March 14, 2008

Attorneys for Industrial Energy Users-Ohio

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Services and Related Matters.)	Case No. 08-0072-GA-AIR
)	
)	
)	
)	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation and for a Change in its Rates and Charges.)	Case No. 08-0073-GA-ALT
)	
)	
)	
)	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.)	Case No. 08-0074-GA-AAM
)	
)	
)	
)	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Revise its Depreciation Accrual Rates.)	Case No. 08-0075-GA-AAM
)	

MEMORANDUM IN SUPPORT

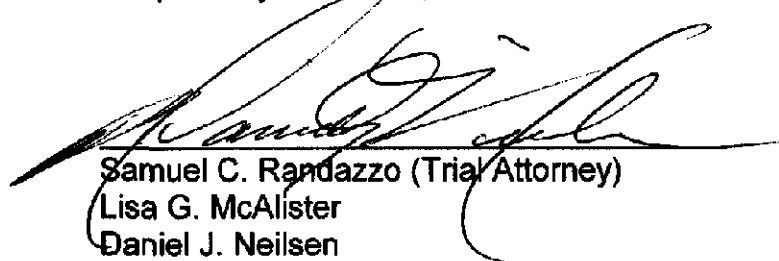
In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/public/about_ieu-ohio/members. IEU-Ohio's members work together to address matters that 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's member companies are served by COH and may be affected by an increase in natural gas distribution rates. Additionally, IEU-Ohio's member companies may be affected by the proposals contained within COH's alternative rate plan, such as the

provisions dealing with cost recovery for COH's advanced mainline replacement program and demand side management program as well as its request to change accounting methods and request for revisions to its depreciation accrual rates.

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)

Lisa G. McAlister

Daniel J. Neilsen

MCNEES WALLACE & NURICK LLC

Fifth Third Center

21 East State Street, 17th Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

lmcalister@mwncmh.com

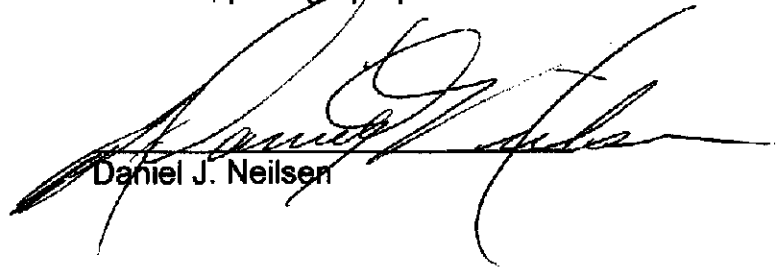
dneilsen@mwncmh.com

March 14, 2008

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 14th day of March 2008, via first class mail, postage prepaid.



Daniel J. Neilsen

Mark Kempic
Assistant General Counsel
Kenneth W. Christman
Associate General Counsel
Stephen B. Seiple
Lead Counsel (Trial Attorney)
Daniel A. Creekmur
Attorney
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Attorneys for Columbia Gas
of Ohio

Janine L. Migden-Ostrander
Consumers' Counsel
Larry S. Sauer
Counsel of Record
Joseph P. Serio
Michael E. Idzkowski
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485

Office of the Ohio Consumers' Counsel