

FILE



SEC

STAND ENERGY
CORPORATION

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March 24, 2008

VIA UPS NEXT DAY AIR SAVER DELIVERY

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 08-72-GA-AIR; 08-73-GA-ALT; 08-74-GA-AAM; 08-75-GA-AAM

Ladies and Gentlemen:

Enclosed for filing are an original and ten copies of Stand Energy Corporation's Motion to Intervene and Memorandum in Support in the above-captioned cases.

Sincerely,

John M. Dosker
General Counsel

Enclosures

This is to certify that the images appearing are an
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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 Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution)	Case No. 08-72-GA-AIR
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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. 08-73-GA-ALT
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In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.)	Case No. 08-74-GA-AAM
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In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Revise its Depreciation Accrual Rates)	Case No. 08-75-GA-AAM
)	

STAND ENERGY CORPORATION'S MOTION TO INTERVENE

Stand Energy Corporation, by and through the undersigned counsel, pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, moves the Commission for Leave to Intervene in the above-styled and numbered matter relating to the Application filed by Columbia Gas of Ohio for approval to increase of its gas distribution rates and for approval of an alternative rate plan including depreciation accrual rates. A Memorandum in Support of this motion is attached.

Respectfully submitted,


John M. Dosker, General Counsel, TA
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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)	

**MEMORANDUM IN SUPPORT OF
STAND ENERGY CORPORATION'S MOTION TO INTERVENE**

On March 3, 2008 Columbia Gas of Ohio, Inc. filed applications with the Commission for authority to increase its gas distribution rates and for approval of an alternative rate plan including authority to revise its depreciation accrual rates.

Stand Energy Corporation ("SEC"), is a Kentucky Corporation, with its primary office located at 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629. SEC is engaged in the marketing of natural gas to numerous end use customers throughout Ohio, including industrial and commercial customers on the Columbia Gas of Ohio, Inc. system.

The grounds for this motion are that the application is for an increase in base distribution rates. The changes requested by Columbia may be detrimental to current Columbia

transportation customers and to the competitive market for natural gas in the Columbia service territory.

SEC has a real and substantial interest in these proceedings. Because of differing commercial goals and direction, SEC avers that no other potential participant can adequately represent its interests in this case. Pursuant to RC §4903.221 and OAC §4901-1-11, SEC respectfully requests that the Commission grant it full Intervenor status. For purposes of considering requests for leave to intervene, OAC 4901-1-11(A) provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: ... (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, RC 4903.221 (B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

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

OAC 4901-1-11 (B) also provides for the following factors to be considered:

(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 proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

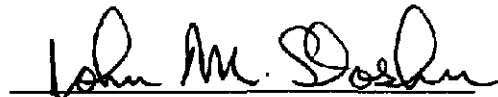
As noted above, Stand Energy is a natural gas marketer on Columbia's system, and serves substantial end-user loads on Columbia's transportation programs. The increased risks, uncertainties, and costs of participating in Columbia's transportation programs may have the effect of discouraging participation in these programs by end-users and suppliers, thereby

significantly harming the competitive market. Stand Energy has substantial interests in this proceeding.

The disposition of these issues without Stand Energy's participation will impair or impede Stand Energy's ability to protect its interests. No other party participating in these proceedings can adequately protect Stand Energy's interests, and accordingly, Stand Energy respectfully asserts that it would be inappropriate to resolve these issues without Stand Energy's participation. Stand Energy's interests and operational experience are substantially and directly related to these issues and the merits of this proceeding. Stand Energy's intervention will contribute to the full and equitable resolution of these matters, and will assist in the expeditious resolution of these issues. Lastly, Stand Energy's intervention will not unduly delay or unjustly prejudice any existing party.

WHEREFORE, Stand Energy Corporation respectfully submits that the Commission should grant its request to intervene in the above-referenced dockets.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's Motion to Intervene and Memorandum in Support was served upon the following parties of record via ordinary U.S. Mail postage prepaid on March 24, 2008.


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