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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 Amend its Filed Tariffs to Increase the Rates and Charges for Gas Service and Related Matters.)	Case No. 08-72-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. 08-73-GA-ALT
)	
In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 08-74-GA-AAM
)	
In the Matter of the Application of Columbia Gas of Ohio, Inc., for Authority to Revise its Depreciation Accrual Rates.)	Case No. 08-75-GA-AAM

MOTION TO INTERVENE OF KNOX ENERGY COOPERATIVE ASSOCIATION, INC.

Now comes Knox Energy Cooperative Association, Inc. (hereinafter "Knox"), by and through counsel, pursuant to Section 4903.221 of the Ohio Revised Code ("RC") and Ohio Administrative Code ("OAC") section 4901-1-11 and hereby moves the Commission for an order granting Knox Intervention in the above-captioned Application by Columbia Gas of Ohio for approval to increase its gas distribution rates and for approval of an alternative rate including depreciation accrual rates. A Memorandum in Support of this Motion is attached hereto and incorporated herein by reference as if fully set forth.

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.
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Respectfully Submitted

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Cooperative Association, Inc.

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**MEMORANDUM IN SUPPORT
OF KNOX ENERGY COOPERATIVE ASSOCIATION, INC.'S MOTION TO
INTERVENE**

MEMORANDUM IN SUPPORT

On March 3, 2008 Columbia Gas of Ohio, Inc. hereinafter ("COH") filed applications with the Public Utilities Commission of Ohio (hereinafter "Commission") for authority to increase its base gas distribution rates and charges and for approval of an alternative rate plan, including authority to revise its depreciation accrual rates.

Knox Energy Cooperative Association, Inc., hereinafter ("Knox") respectfully submits that it is entitled to intervene in the above-captioned proceedings, both on the substantive merits and timeliness of Knox's request.

For purposes of considering requests for leave to intervene in a Commission proceeding, 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 the following factors in considering requests to intervene:

(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.

Knox is a cooperative natural gas distributor that provides economical and efficient energy alternatives by maintaining and operating natural gas distribution systems on behalf of its member individuals and businesses, hereinafter ("Members"). Knox purchases certain tariff services on behalf of its Members from COH. Knox's interests could potentially be adversely affected by the resolution of the issues raised in this proceeding, and the Commission's determinations and findings herein. Inasmuch as these proceedings may adversely impact the rates for services Knox takes from COH, specifically rates under COH's Full Requirements Cooperative Transportation Service Tariff (Section VII), as well as COH's retail marketplace,

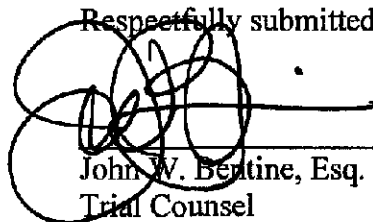
and Knox and its Member's interests in that market, Knox has real, direct, and substantial interests in this proceeding.

Knox is situated so that the disposition of issues in this proceeding without Knox's participation will impair and impede its ability to protect its interests, because others participating in this proceeding do not adequately represent Knox. Inasmuch as others participating in these proceedings cannot adequately protect the interests of Knox, it would be inappropriate to proceed without the participation of Knox. The perspective and participation of Knox will significantly contribute to the full development and equitable resolution of the factual and legal issues in this proceeding. The intervention of Knox will not unduly delay or prolong the proceeding, or unjustly prejudice the interests of any existing party. Finally, this request for intervention by Knox is timely.

III. CONCLUSION

As noted above, COH's applications have raised issues that may impact Knox's rates and competitive retail markets, and therefore, Knox, on behalf of itself and its Members has direct and substantial interests in these proceedings. Thus, Knox respectfully requests the Commission grant the request of Knox to intervene in the above-captioned proceedings.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'JBentine', is written over a horizontal line.

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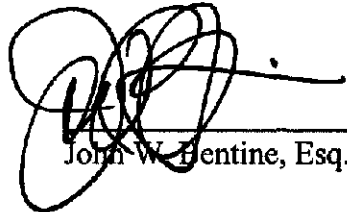
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CERTIFICATE OF SERVICE

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 April 3, 2008.



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