

FILE

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

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

2008 MAY -2 PM 4:03

RECEIVED-DOCKETING DIV

P
U
C
O

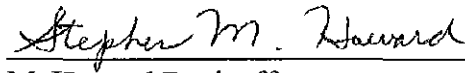
MOTION TO INTERVENE OF THE OHIO GAS MARKETERS GROUP

Now comes the Ohio Gas Marketers Group consisting of Commerce Energy, Inc., Hess Corporation, Integrys Energy Services, Inc., Interstate Gas Supply, Inc. and SouthStar Energy Services LLC and pursuant to Section 4903.221 Revised Code and Rule 4901-1-11 of the Ohio Administrative Code moves for intervention in the above styled proceeding. The reasons supporting the Motion to Intervene are set forth in the accompanying Memorandum in Support.

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 Amr Date Processed 5/2/08

WHEREFORE, the Ohio Gas Marketers Group respectfully requests that it be permitted to intervene in these matters.

Respectfully submitted,

A handwritten signature in cursive script that reads "Stephen M. Howard". The signature is written in dark ink and is positioned above a horizontal line.

M. Howard Petricoff

Stephen M. Howard

Vorys, Sater, Seymour and Pease LLP

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

Tel: (614) 464-5414

Fax: (614) 719-4904

E-mail: mhpetricoff@vorys.com

Attorneys for The Ohio Gas Marketers Group

**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
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

MEMORANDUM IN SUPPORT

Section 4903.221, Revised Code establishes the following items which the Commission must consider when ruling on a motion to intervene:

- (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 case;
- (3) whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; and
- (4) whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

To implement this statutory provision the Commission promulgated Rule 4901-1-11(B) of the Ohio Administrative Code which instructs Legal Director, the Deputy Legal Director, or the Attorney Examiner to consider:

- (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.

The Ohio Gas Marketers Group is an organization consisting of active competitive natural gas suppliers serving Ohio. All of the above named members have customers in the Columbia Gas of Ohio, Inc. ("Columbia") service area. All the members of the Ohio Gas Marketers Group have pooling arrangements with Columbia. Together, the Ohio Gas Marketers Group represents a substantial portion of all the natural gas which flows on the Columbia system.

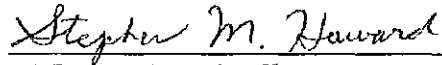
Columbia filed its Applications in these cases on March 3, 2008. The proposals contained in both the rate increase case and the alternative rate plan will affect the dynamics of competition and customer choices in Columbia Gas' service territory. These proposals, if adopted, will have consequences on the operations and business interests of the members of the Ohio Gas Marketers Group. Therefore, the Ohio Gas Marketers Group and its members have a real and substantial interest in these matters.

The Ohio Gas Marketers Group consists of experienced competitive retail natural gas providers in the Columbia Gas system as well as experienced operators in several other states. The Ohio Gas Marketers Group members' experience and knowledge will assist the Commission in considering the issues in these cases and, therefore, the Ohio Gas Marketers Group participation will contribute to the full development and equitable resolution of the issues. No other party can adequately represent the interests of the Ohio Gas Marketers Group. The Ohio Gas Marketers Group's participation will not unduly delay or unjustly prejudice any existing party. For the above-discussed reasons, the Ohio Gas Marketers Group has a direct, real and substantial interest in the issues in these matters, which can only be protected by its participation.

III. CONCLUSION

WHEREFORE, for the reasons explained above, the Ohio Gas Marketers Group respectfully requests that the Commission permit it to intervene in the above-captioned proceedings and be made a party for all purposes.

Respectfully submitted,

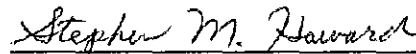
A handwritten signature in cursive script that reads "Stephen M. Howard". The signature is written in dark ink and is positioned above a horizontal line.

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
Tel: (614) 464-5414
Fax: (614) 719-4904
E-mail: mhpetricoff@vorys.com

Attorneys for the Ohio Gas Marketers Group

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Intervene was served upon the following persons via e-mail and via first-class U.S. mail, postage prepaid, this 2nd day of May, 2008.


Stephen M. Howard

Larry S. Sauer
Joseph Serio
Michael E. Idzkowski
Office of the Consumers Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
sauer@occ.state.oh.us
serio@occ.state.oh.us
idzkowski@occ.state.oh.us

Stephen B. Seiple
Columbus Gas of Ohio, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117
sseiple@nisource.com

Dan Neilsen
McNees, Wallace & Nurick
21 E. State Street, 17th Floor
Columbus, OH 43215
dneilsen@mwncmh.com

John Bentine
Chester, Willcox & Saxbe
65 E. State, Suite 1000
Columbus, OH 43215
jbentine@cwslaw.com

John Dosker
Stand Energy
1077 Celestial, Suite 110
Cincinnati, OH 45202-1629
jdosker@stand-energy.com

David Boehm
Michael Kurtz
36 East Seventh Street, Room 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com

William S. Newcomb, Jr.
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
wsnewcome@vorys.com

Barth Royer
Bell & Royer
33 S. Grant Avenue
Columbus, OH 43215-3900
BarthRoyer@aol.com

Colleen Mooney
Ohio Partners for Affordable Energy
1431 Mulford Road
Columbus, OH 43212
cmooney2@columbusrr.com