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**Before
The Public Utilities Commission of Ohio**

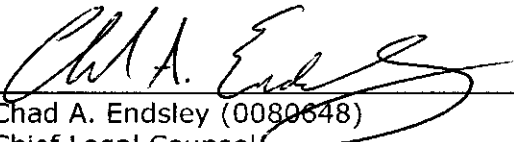
In the Matter of the Application)	
of Columbia Gas of Ohio, Inc. for)	
Approval of Demand Side)	Case No. 11-5028-GA-UNC
Management Programs for its)	
Residential and Commercial)	Case No. 11-5029-GA-UNC
Customers and the Application)	
for Approval to Change)	
Accounting Methods)	

Motion to Intervene of the Ohio Farm Bureau Federation


The Ohio Farm Bureau Federation (OFBF) pursuant to Section 4903.221 of the Ohio Revised Code (ORC) and Rule 4901-1-11 of the Ohio Administrative Code (OAC), moves for intervention in the above dockets as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth in the accompanying memorandum of support.

For the reasons stated below, OFBF requests that its motion for intervention be granted and that it be made a full party of record.

Respectfully Submitted,



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**Memorandum in Support of Motion to Intervene
of the Ohio Farm Bureau Federation**

On September 9, 2011, Columbia Gas of Ohio (COH) filed its application seeking approval to continue and expand its Demand Side Management (DSM) program approved by the Public Utilities Commission of Ohio (PUCO) in Case No. 08-833-GA-UNC. Specifically, the company explains that it seeks approval for a variety of continued, new and expanded DSM programs focusing on energy efficiency and weatherization. The company proposes to spend approximately \$20 million annually on the proposed programs which will be effective for residential and commercial customers for calendar years 2012 through 2016.

COH currently recovers the costs of its DSM programs through its DSM Rider. Under current procedures approved by the PUCO in Case No. 08-0072-GA-AIR et al., COH's DSM Rider is adjusted effective May each year to enable company to recover the DSM costs incurred during the prior calendar year. As part of the application, COH seeks to revise this cost recovery procedure.

In November 2011 Columbia Gas of Ohio will file a Notice of Intent for its next DSM Rider adjustment, followed by an application in February 2012. PUCO action upon the February 2012 application will establish a new DSM Rider rate to become effective in May

2012. Thereafter, COH proposes to maintain the DSM Rider rate established in May 2012 for the duration of the DSM program, or until all costs have been fully recovered.

As described in their Application, Columbia Gas of Ohio requests authority to defer the difference between costs recovered through the DSM Rider and the actual costs of implementing the proposed programs. The company explains that this change will enable the utility to continue DSM programs while relieving the Commission Staff and other parties of the burden of an annual review and DSM Rider rate adjustments.

Given proposed tariff changes and program options discussed, OFBF member natural gas utility costs, and access to new and/or different programs, tools and opportunities to further control those energy costs will be affected by the outcome of these proceedings.

I. OFBF Should be Granted Intervention as a Party of Record

Pursuant to Section 4903.221 of the ORC and Rule 4901-1-11 of the OAC, OFBF moves for intervention in this proceeding as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth herein.

Rule 4901-1-11 (A) of the OAC states in part:

Upon timely motion, and person shall be permitted to intervene in a proceeding 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 particular matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Included as factors to be considered are the nature of the intervener's interests, the extent those interests are represented by existing parties, the intervener's potential contribution to the resolution of issues and whether intervention would result in undue delay of the proceeding. Similar provisions are detailed in Section 4903.221(B) of the ORC.

The Ohio Farm Bureau Federation and its member county Farm Bureaus maintain a non-profit organization representing agricultural interests at the state and local levels. Over 214,000 member families belong to the organization. Farm Bureau members engage in a

variety of industrial activities – food processing, commodity processing/conditioning/handling, biofuel production and general manufacturing; and mercantile operations – farms, agribusiness support, feed processing, grain conditioning and green house operation. Some members are involved in small business enterprises – restaurants, cleaners and other services. Moreover, all are residential energy consumers – Many of Farm Bureau’s members in rural, suburban and residential neighborhoods are served by COH.

OFBF represents a diverse group of industrial, small business and residential energy consumers. Over the past two decades the organization has worked with COH, the Public Utilities Commission of Ohio (PUCO), other government agencies, energy service providers and other interested groups to use COH’s general transportation service (GTS) provisions to establish self-help natural gas aggregation programs for commercial customers. Similarly, OFBF has been active in COH’s CHOICE Collaborative. The organization has worked with the parties mentioned above to establish similar programs for residential energy consumers.

COH explains in its application that it has shared the costs, savings and a description of the proposed programs with Columbia's Demand Side Management Stakeholder Group (DSMSG). OFBF has been active in these stakeholder discussions concerning these issues. Moreover, OFBF has had the opportunity to work on similar collaborative focusing on customer choice, DSM and energy efficiency programs with Vectren Energy Delivery of Ohio and American Electric Power – Ohio.

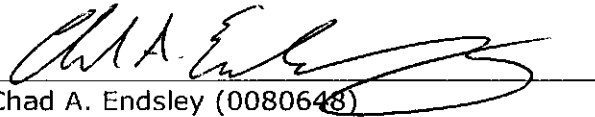
OFBF leaders will be able to share their program experiences and unique perspective with the PUCO as it works with COH and others to develop effective outcomes for this case. Moreover, OFBF’s participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party and will contribute to the just and quick resolution of issues and concerns raised.

Given the diverse, yet unique energy needs of its members, self-help experience, technical interests and support for collaboration, the Ohio Farm Bureau Federation submits that good cause exists to grant it leave to intervene in this proceeding.

II. Conclusion

For the means explained above, the Ohio Farm Bureau Federation requests that its motion for intervention be granted and that it be made a full party of record.


Respectfully Submitted,



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Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 5th day of October 2011 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.


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