

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbia)
Gas of Ohio, Inc., for Approval of an) Case No. 11-5515-GA-ALT
Alternative Form of Regulation.)

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

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May 31, 2012

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MOTION TO INTERVENE 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 ("OAC"), for leave to intervene in the above-captioned matter(s) with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the OAC, to intervening parties.

On December 9, 2011, Columbia Gas of Ohio, Inc. ("Columbia"), filed a notice of intent to file an application for approval of an alternative rate plan pursuant to Rule 4901:1-19-05, OAC. On March 5, 2012, Columbia filed an amended notice of intent stating that its application will seek authority to continue the infrastructure replacement program rider ("Rider IRP") portion of its alternative regulation plan for another five-year period. Contemporaneous with its March 5, 2012, amended notice of intent, Columbia filed an amended motion for waiver of standard filing requirements.

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,



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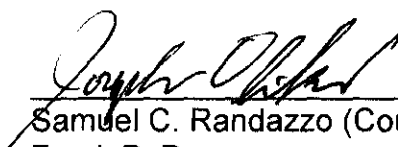
MEMORANDUM IN SUPPORT

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 Columbia, which is a public utility subject to the jurisdiction of the Commission. IEU-Ohio member company facilities are served on the tariffs from which Columbia proposes to recover Infrastructure Replacement Program ("IRP") charges and Economic Development ("ED") program charges.

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 Columbia.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Samuel C. Randazzo", is written over a horizontal line.

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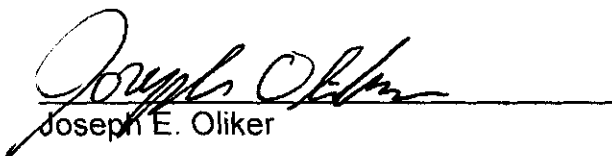
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Attorneys for Industrial Energy Users-Ohio

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio*, was served upon the following parties of record this 31st day of May, 2012 via first class mail, postage prepaid.



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