

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Joint Motion to Modify )	
the December 2, 2009 Opinion and Order )	Case No. 12-2637-GA-EXM
and the September 7, 2011 Second )	
Opinion and Order in Case No. )	
08-1344-GA-EXM )	

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MOTION TO INTERVENE

BY

HONDA OF AMERICA MFG., INC.

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Now comes Honda of America Mfg., Inc. ("Honda"), and respectfully moves the Commission for leave to intervene in this matter pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. Honda has a real, direct and substantial interest in the issues and matters involved in the above-captioned proceeding. Honda's interest in this proceeding is not adequately represented by any existing party and granting this motion to intervene will not unduly delay this proceeding or unjustly prejudice any party. The attached memorandum sets forth more fully reasons the Commission should grant Honda's Motion.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

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As a large volume transporter on the Columbia system, Honda moves this Commission for leave to intervene in this proceeding to protect its interest in receiving reasonable service as a Columbia customer.

R.C. 4903.221 provides, in part, that any person “who may be adversely affected” by a PUCO proceeding is entitled to seek intervention in that proceeding. Honda, as a large volume customer of Columbia “may be adversely affected” by this proceeding. Thus, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C 4903.221(b) requires the Commission to consider the following criteria in ruling on motions 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 merits of 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 the full development and equitable resolution of the factual issues.

Honda is an active large volume gas consumer and transporter on the Columbia system and is one of the original members of what has come to be described as the Columbia Collaborative. As a Collaborative member, Honda has participated in and is a signatory to Joint Stipulations of past Columbia rate proceedings including the proceeding that led to the establishment of the Stakeholder Group (2007) and has been an active participant in the Stakeholder Group negotiations over the last several years.

Honda submits that its participation in this proceeding with the experience and expertise that it brings, will contribute to a just and expeditious resolution of the issues raised in this proceeding. Honda further submits that its intervention will not unduly delay the proceeding or unjustly prejudice an existing party. Without the ability to participate, however, Honda's interest in this proceeding will not be adequately protected by the existing parties.

In addition, Honda meets the criteria of Ohio Admin. Code 4901-1-11(A). Honda has a real and substantial interest in this proceeding and should be granted leave to intervene in order to protect its interests as an active and significant consumer of gas transportation services on the Columbia system.

For the reasons stated above, Honda respectfully requests that its Motion for Leave to Intervene be granted.

Respectfully submitted,

/s/ M. Anthony Long

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Certificate of Service

I hereby certify that a copy of the foregoing Motion to Intervene was served upon all parties of record by electronic mail this 5<sup>th</sup> day of November, 2012.

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Summary: Motion Motion to Intervene electronically filed by Mr. M. Anthony Long on behalf of Honda of America Mfg., Inc.