

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion East Ohio)
for Approval of an Alternative Form of) Case No. 15-362-GA-ALT
Regulation.)

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE**

Ohio Partners for Affordable Energy ("OPAE") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matter pursuant to Revised Code ("R.C.") §4903.221 and Rule 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion to intervene are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,

/s/Colleen Mooney
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MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in this matter pursuant to Section 4903.22.1, Revised Code, and the Commission’s Rules contained in Rule 4901-01-11 of the Ohio Administrative Code. The above-referenced application of The East Ohio Gas Company d/b/a Dominion East Ohio’s (“Dominion”) seeks approval of an alternative rate plan under R.C. 4929.05 for authority to implement an accelerated pipeline replacement program in Dominion’s service territory.

In determining whether to permit intervention, the following criteria are to be considered: the nature of the person’s interest; the extent to which that interest is represented by existing parties; the person’s potential contribution to a just and expeditious resolution of the proceeding; and, whether granting the intervention will unduly delay or unjustly prejudice any existing party. OPAE meets all four criteria for intervention in this matter.

OPAE is an Ohio non-profit corporation with a stated purpose of advocating for affordable energy policies for low and moderate income Ohioans; as such, OPAE has a real and substantial interest in this matter. Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by the matter.¹ Moreover, many of OPAE’s members are community action agencies.

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, community action is charged with advocating for low-income residents of their communities.

OPAE members also provide essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of Dominion. OPAE members are also non-residential ratepayers of Dominion. Therefore, OPAE has an interest in this proceeding that will consider Dominion's application for an alternative rate plan.

For the above reasons, OPAE has a direct, real and substantial interest in this matter. The disposition of this matter may impair or impede the ability of OPAE to protect its interests. No other party to the matter will adequately represent the interests of OPAE. OPAE is a rare organization that serves as an advocate, service provider and non-profit customer group. No other party represents this group of interests. OPAE's participation in this matter will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to a just and expeditious resolution of the issues raised by this case. Further, OPAE has been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this case.

Therefore, OPAE is entitled to intervene in this matter with the full powers and rights granted by statute and by the provisions of the Commission's Code of Rules and Regulations to intervening parties.

Respectfully submitted,

/s/Colleen Mooney

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(willing to accept service by e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene and Memorandum in Support was served electronically upon the persons identified below on this 21st day of April 2015.

/s/Colleen Mooney
Colleen L. Mooney

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/21/2015 4:57:10 PM

in

Case No(s). 15-0362-GA-ALT

Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy