

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )	
Columbia Gas of Ohio, Inc. for an Adjustment )	Case No. 15-1918-GA-RDR
to Rider IRP and Rider DSM Rates. )	

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**OHIO PARTNERS FOR AFFORDABLE ENERGY'S  
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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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 R.C. §4903.221 and Section 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 in support attached hereto and incorporated herein.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE**

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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 and Regulations contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application made by Columbia Gas of Ohio, Inc. (“Columbia”) requests an adjustment to Columbia’s Rider IRP (Infrastructure Replacement Program) and Rider DSM (Demand-Side Management) rates. Columbia initiated this application with a notice of intent to file an application to adjust Rider IRP and Rider DSM rates. The adjustment to the rates will be for costs incurred during calendar year 2015. Columbia is proposing a Small General Service (“SGS”) class rate of \$7.65 per customer per month beginning May 2016.

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, which will affect the rider rates paid by low and moderate-income residential customers of Columbia who take service

under the SGS rate. The matter will also affect the DSM programs available to those customers. The IRP and DSM rider rates should be no more than what is reasonable and unlawful under Ohio law, for service that is adequate under Ohio law.

Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by the application.<sup>1</sup> OPAE members are also customers of Columbia. Many of OPAE's members are community action agencies. Under the federal legislation authorizing the creation and funding of these agencies, originally known as the Economic Opportunity Act of 1964, community action agencies are charged with advocating for low-income residents of their communities. OPAE also provides essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low-income customers of Columbia.

OPAE's primary interest in this case is to protect the interests of low and moderate-income customers and OPAE members whose rates and provision of service will be affected by this application. OPAE seeks to address any issues as may arise during consideration of this matter. 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.

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 nonprofit customer group. No other party represents this group of interests. OPAE's participation in this matter will not cause undue delay, will not

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<sup>1</sup> A list of OPAE members can be found on the website: [www.ohiopartners.org](http://www.ohiopartners.org).

unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues raised by this application.

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,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support was served electronically upon the parties identified below on this 24th day of March 2016.

/s/Colleen L. Mooney  
Colleen L. Mooney

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