

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

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**MARCH 24, 2016**

**ATTORNEYS FOR INDUSTRIAL ENERGY USERS-  
OHIO**

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Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matters with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On February 26, 2016, Columbia Gas of Ohio, Inc. ("Columbia") filed an application to adjust Rider IRP and Rider DSM rates. If approved, Columbia's application could impact the rates applicable to IEU-Ohio members.

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 proceeding, and is so situated that the disposition of this proceeding 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 the proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding 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,

/s/ Frank P. Darr

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**Attorneys for Industrial Energy Users-Ohio**

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**MEMORANDUM IN SUPPORT**

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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](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 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 Demand Side Management ("DSM") 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,

/s/ Frank P. Darr

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**Attorneys for Industrial Energy Users-Ohio**

## **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the Commission's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 24th day of March 2016, *via* electronic transmission.

/s/ Frank P. Darr

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**ON BEHALF OF THE STAFF OF THE PUBLIC  
UTILITIES COMMISSION OF OHIO**

**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 15-1918-GA-RDR**

Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio  
electronically filed by Mr. Frank P Darr on behalf of Industrial Energy Users-Ohio