

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval of)	
Demand Side Management Program for)	Case No. 16-1309-GA-UNC
its Residential and Commercial)	
Customers.)	

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval to)	Case No. 16-1310-GA-AAM
Change Accounting Methods.)	

MOTION TO INTERVENE OF INTERSTATE GAS SUPPLY, INC.

Pursuant to Ohio Revised Code ("ORC") 4903.221 and Ohio Administrative Code ("OAC") 4901-1-11, Interstate Gas Supply, Inc. ("IGS") moves for leave to intervene in the above captioned proceedings in which Columbia Gas of Ohio, Inc. ("Columbia") seeks Public Utilities Commission of Ohio ("Commission") approval for the continuation of its Demand Side Management Program ("DSM Program") for calendar years 2017-2022. IGS has real and substantial interest in these proceedings that will not be protected in the absence of IGS intervention. The interests of IGS are not represented by any other party in the proceedings.

IGS respectfully request the Commission grant its Motion. The reasons for IGS's Motion are more fully set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Joseph Olikier

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MEMORANDUM IN SUPPORT

For purposes of considering requests for leave to intervene in a Commission proceeding, OAC 4901-1-11(A) provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: ... (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, RC 4903.221(B) and Rule 4901-1-11(B), OAC, provide that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

(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; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

In these proceedings, Columbia seeks Commission approval to continue its DSM Program through calendar year 2022. The DSM Program includes initiatives that address

energy efficiency and weatherization measures for a broad range of customer classes, all of which are served by IGS.

IGS is a certified competitive retail electric service (“CRES”) provider and a certified competitive retail natural gas (“CRNG”) provider serving customers in the State of Ohio for over 25 years. IGS and its family of companies provide its customers with a diverse range of retail products and services, including energy efficiency-related products and services.

IGS has a direct interest in these proceedings. Without the ability to fully participate in these proceedings IGS’s direct interest will be substantially prejudiced. Inasmuch as others participating in these proceedings cannot adequately protect IGS’s interests, it would be inappropriate to determine these proceedings without IGS’s participation.

Finally, IGS’s participation will not unduly delay these proceedings. Moreover, IGS will contribute to full development and equitable resolution of the factual issues in these proceedings.

The Supreme Court of Ohio has held that intervention should be liberally allowed for those with an interest in the proceeding.¹ In light of the liberal interpretation of the intervention rules, and for the reasons stated above, IGS meets the standards for intervention in this proceeding.

For the reasons set forth above, IGS respectfully requests the Commission grant this Motion to Intervene.

¹ *Ohio Consumers’ Counsel v. Pub. Util. Comm.*, (2006) 111 OhioSt.3d 384, 388.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Interstate Gas Supply, Inc.'s Motion to Intervene and Memorandum in Support* was served this 14th day of July, 2016 via electronic mail upon the following:

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Summary: Motion to Intervene and Memorandum in Support electronically filed by Mr. Joseph E. Oliker on behalf of IGS Energy