



**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of                    )  
Columbia Gas of Ohio, Inc. for                    ) Case No. 16-2422-GA-ALT  
Approval of an Alternative Form of                )  
Regulation.

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**OHIO PARTNERS FOR AFFORDABLE ENERGY'S  
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 (“R.C.”), 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”) is for an alternative form of regulation pursuant to R.C. 4929.05 for authority to implement an accelerated pipeline replacement program in its service territory and recover the costs through a rider.

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 proceedings; 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 application.<sup>1</sup> Moreover, many of OPAE’s members are community action agencies.

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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).

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 and its members also provide essential services in the form of bill payment assistance programs and weatherization and energy efficiency services to low income customers of Columbia. OPAE members are also non-residential ratepayers of Columbia.

OPAE's primary interest in this matter is to protect the interests of low and moderate income residential customers of Columbia and OPAE members whose provision of natural gas distribution service will be affected by this application. 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 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 the just and expeditious resolution of the issues raised by this matter.

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

Respectfully submitted,

/s/Colleen Mooney

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## **CERTIFICATE OF SERVICE**

A copy of the foregoing Motion to Intervene and Memorandum of Support will be served on this 9th day of March 2017 by the Commission's e-filing system to these parties who have electronically subscribed to this case.

/s/Colleen Mooney

Colleen L. Mooney

## **SERVICE LIST**

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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