

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

Via E-FILE

December 14, 2017

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

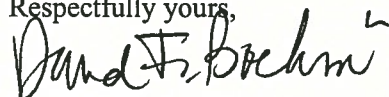
In re: Case No. 17-2202-GA-ALT

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP's MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.

Cc: Certificate of Service

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio, : Case No. 17-2202-GA-ALT
Inc. for Approval of an Alternative Form of Regulation :

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant the Ohio Energy Group ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members participating in this intervention are: AK Steel Corporation, Amsted Rail Company, Inc., ArcelorMittal USA, Fiat-Chrysler LLC, Ford Motor Company, General Motors LLC, Johns Manville (Berkshire Hathaway), Materion Brush Inc., and Worthington Industries. These companies use large quantities of natural gas in the manufacture of their products and transport this gas through Columbia Gas. Therefore, the interests of OEG's members may be indirectly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission. OEG will supplement the names of additional intervenors when necessary.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail dboehm@BKLawfirm.com

mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

December 13, 2017

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio, : Case No. 17-2202-GA-ALT
Inc. for Approval of an Alternative Form of Regulation :

**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: dboehm@BKLawfirm.com

mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

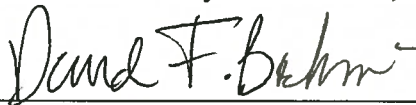
jkylercohn@BKLawfirm.com

December 13, 2017

COUNSEL FOR OHIO ENERGY GROUP

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO'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 OF THE OHIO ENERGY GROUP (OEG) was sent to the following parties of record *via* electronic transmission this 14th day of December, 2017 to the following:



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

COLUMBIA GAS OF OHIO, INC.
STEPHEN SEIPLE
290 W NATIONWIDE BLVD
COLUMBUS OH 43215

*MACDONALD, CHERYL A
NISOURCE INC.
290 W. NATIONWIDE BLVD.
COLUMBUS OH 43215

*MOONEY, COLLEEN L
OPAE
PO BOX 12451
COLUMBUS OH 43212-2451

*THOMPSON, MELISSA L. MS.
COLUMBIA GAS OF OHIO, INC.
290 W. NATIONWIDE BLVD
COLUMBUS OH 43215

*DARR, FRANK P MR.
MCNEES, WALLACE & NURICK
21 E. STATE STREET 17TH FLOOR
COLUMBUS OH 43215

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/14/2017 3:35:35 PM

in

Case No(s). 17-2202-GA-ALT

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. David F. Boehm on behalf of Ohio Energy Group