

In the Matter of the Application of )  
Suburban Natural Gas Company for Approval ) Case No. 18-376-GA-RDR  
of an Energy Efficiency Program (EEP) Pilot )  
and Rider EEP Rate. )

Ohio Partners for Affordable Energy (“OPAE”) respectfully moves the Public Utilities Commission of Ohio (“Commission”) for leave to intervene in the above-captioned matter pursuant to Revised Code Section 4903.221 and Rule 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.

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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 Code of Rules and Regulations contained in Rule 4901-1-11 of the Ohio Administrative Code. The above-referenced application made by Suburban Natural Gas Company (“Suburban”) requests approval of an Energy Efficiency Program (“EEP”) Pilot and Rider EEP rate.

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 in which Suburban seeks approval of an Energy Efficiency Program pilot and EEP Rider rate. Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by the application.<sup>1</sup> Many of OPAE's members are community action agencies. Under the federal legislation authorizing the creation and funding of these

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

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 Suburban.

OPAE's primary interest in this case is to protect the interests of low and moderate-income customers of Suburban 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 nonresidential 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 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,

/s/Colleen L. Mooney

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## **CERTIFICATE OF SERVICE**

A copy of the foregoing Motion to Intervene and Memorandum in Support will be served electronically by the Commission's Docketing Division upon the parties identified below on this 18th day of April 2018.

/s/Colleen L. 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