

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban Natural Gas Company for an Increase in Gas Distribution Rates.)))	Case No. 18-1205-GA-AIR
In the Matter of the Application of Suburban Natural Gas Company for Tariff Approval.)))	Case No. 18-1206-GA-ATA
In the Matter of the Application of Suburban Natural Gas Company for Approval of Certain Accounting Authority.)))	Case No. 18-1207-GA-AAM

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

Ohio Partners for Affordable Energy ("OPAE") respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above-captioned matters 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.

Respectfully submitted,

/s/Colleen Mooney
Colleen L. Mooney
Reg. No. 0015668
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
Telephone: (614) 488-5739
e-mail: cmooney@opae.org
(will accept e-mail service)

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban Natural Gas Company for an Increase in Gas Distribution Rates.)))	Case No. 18-1205-GA-AIR
In the Matter of the Application of Suburban Natural Gas Company for Tariff Approval.)))	Case No. 18-1206-GA-ATA
In the Matter of the Application of Suburban Natural Gas Company for Approval of Certain Accounting Authority.)))	Case No. 18-1207-GA-AAM

MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE

Ohio Partners for Affordable Energy (“OPAE”) should be permitted to intervene in these matters 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 applications made by Suburban Natural Gas Company (“Suburban”) request an increase in gas distribution rates, tariff approval, and approval of certain accounting authority.

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 these matters.

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 these matters in which Suburban seeks an increase in gas distribution rates, tariff approval, and certain accounting authority.

Additionally, OPAE includes as members non-profit organizations located in the service area that will be affected by the applications.¹ Many of OPAE's members are Community Action Agencies. 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 also provides essential services in the form of bill payment assistance programs and has provided weatherization and energy efficiency services to low-income customers of Suburban.

OPAE's primary interest in these cases is to protect the interests of low and moderate-income customers of Suburban whose rates and provision of service will be affected by these applications. OPAE seeks to address any issues as may arise during consideration of these matters. 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 these cases.

For the above reasons, OPAE has a direct, real and substantial interest in these matters. The disposition of these matters may impair or impede the ability of OPAE to protect its interests. No other party to the matters 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 these matters 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 these applications.

Therefore, OPAE is entitled to intervene in these matters 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.

¹ A list of OPAE members can be found on the website: www.ohiopartners.org.

Respectfully submitted,

/s/Colleen L. Mooney

Colleen L. Mooney

Ohio Partners for Affordable Energy

PO Box 12451

Columbus, OH 43212

Telephone: (614) 488-5739

cmooney@opae.org

(will accept service by e-mail)

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 7th day of September 2018.

/s/Colleen L. Mooney
Colleen L. Mooney

SERVICE LIST

bojko@carpenterlipps.com
barthel@carpenterlipps.com
christopher.healey@occ.ohio.gov
william.wright@ohioattorneygeneral.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/7/2018 3:59:02 PM

in

Case No(s). 18-1205-GA-AIR, 18-1206-GA-ATA, 18-1207-GA-AAM

Summary: Motion to Intervene and Memorandum in Support electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy