

**BEFORE
THE OHIO POWER SITING BOARD**

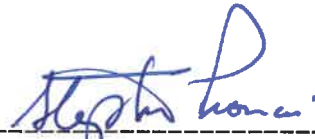
In the Matter of the Columbia Gas of)
Ohio Inc.'s Letter of Notification regarding) Case No. 19-2148-GA-BLN
The Northern Loop Pipeline Project in)
Northwest Franklin County, Ohio)

**PETITION FOR LEAVE TO INTERVENE
OF
THE MADISON COUNTY COMMISSIONERS**

Pursuant to Ohio Revised Code Section 4906.08(A)(3) and Ohio Administrative Code Rule 4906-2-12(A)(2), the Madison County Commissioners (the "Commissioners") file this petition for leave to intervene in this proceeding. The reasons supporting this intervention request are set forth in the accompanying Memorandum in Support.

WHEREFORE, the Commissioners respectfully request that the Ohio Power Siting Board grant this petition for leave to intervene in this proceeding.

Respectfully submitted,



Stephen J. Pronai (#0012063)
Madison County Prosecutor
59 North Main Street
London, Ohio 43140
740.852.2259 (o)
740.845.1694 (f)
spronai@co.madison.oh.us

**MEMORANDUM IN SUPPORT OF
THE BUSINESS NETWORK FOR OFFSHORE WIND, INC.'S
PETITION FOR LEAVE TO INTERVENE**

Pursuant to Ohio Revised Code Section (“R.C.”) 4906.08, a person may petition the Ohio Power Siting Board (“Board”) for leave to intervene in proceedings such as this one within 30 days after the date of publication of the notice required by R.C. 4906.06(C). Furthermore, with accelerated applications to the Board, a person may petition the Board for leave to intervene in proceedings such as this one within 10 days after the newspaper publication announcing the Letter of Notification by and applicant. The newspaper announcement by Columbia Gas of Ohio Inc. (“Columbia”) occurred on December 21st, thereby placing the final date to file for a leave to intervene as December 31st. The Commissioners timely file this petition for leave to intervene in this matter.

Ohio Administrative Code Rule 4906-2-12(B) states that the petitions for leave to intervene shall be granted upon a showing of good cause and states that the following may be considered in that analysis:

- (a) The nature and extent of the person’s interest.
- (b) The extent to which the person’s interest is represented by existing parties.
- (c) The person’s potential contribution to a just and expeditious resolution of the issues involved in the proceeding.

(d) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.

In this matter, on December 20, 2019, Columba filed a Letter of Notification for intent to complete Phase 7 of the Northern Loop Project (the "Project") with the stated purpose of providing natural gas service to new industries and residential development along the route. This Columbia Gas of Ohio Project will bring additional natural gas supply from the New Albany area into northwestern Franklin County and southeastern Union County, bringing regional benefit to Union, Madison, and Logan Counties, all of which are currently facing significant natural gas capacity issues. Columbia Gas of Ohio has stated that Madison County will receive benefit from the Project because bringing gas from the New Albany area into northwestern Franklin County will free up an undetermined amount of gas for Madison County that is currently being used by natural gas users in western Franklin County.

The Commissioners are the primary local governing body representing the interests of the roughly 44,000 Madison County residents and our overall community's economic wellbeing. The Commissioners are focused on continuing to create an environment in Madison County that is conducive for our existing industry to grow and for the attraction of new industry and residential development to the area.

The Commissioners take interest in this proceeding as they have become informed that Madison County faces significant natural gas capacity issues at the

transmission level. A lack of sufficient natural gas capacity will hinder future growth in Madison County as development is generally attracted to locations that provide the lowest amount of risk, lowest cost, and fastest speed to project completion. Columbia Gas of Ohio provides natural gas service to Madison County by obtaining their gas supplies from the fully subscribed interstate pipelines.

As such, the Commissioners are interested in this Project to assess whether it will provide a long-term regional solution benefiting Madison County.

The Ohio Gas Access Partnership (OBAP), will also be submitting a petition for leave to intervene in this proceeding. OGAP represents similar interest in pursuing long-term regional solutions to current natural gas capacity concerns. However; the Commissioners, bring unique experience to the proceeding having the greatest knowledge of growth corridors in the county, knowledge of additional infrastructure investments outside of natural gas that will drive future development, and the voice of local industry through its economic development operations. The Commissioners can contribute to a just and expeditious resolution of the issues involved in the proceeding, its participation will not unduly delay the proceeding or unjustly prejudice an existing party. The commissioners have a unique perspective, extensive infrastructure development experience and extensive local knowledge, all of which can assist the Board in its consideration of this matter.

For these reasons, intervention is reasonable, good cause has been established, and the Commissioners' petition for leave to intervene should be granted.

Respectfully submitted,



Stephen J. Pronai (#0012063)
Madison County Prosecutor
59 North Main Street
London, Ohio 43140
740.852.2259 (o)
740.845.1694 (f)
spronai@co.madison.oh.us

CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically service notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 31st day of December 2020 upon all persons listed below:

Joseph Clark
NiSource Corporate Services Company
290 West Nationwide Blvd.
Columbus, OH 43215

Cheryl A. MacDonald
NiSource Inc.
290 West Nationwide Blvd.
Columbus, OH 43215



Stephen J. Pronai (#0012063)
Madison County Prosecutor
59 North Main Street
London, Ohio 43140
740.852.2259 (o)
740.845.1694 (f)
spronai@co.madison.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/31/2019 12:26:33 PM

in

Case No(s). 19-2148-GA-BLN

Summary: Petition Petition for Leave to Intervene of the Madison County Commissioners electronically filed by Stephen J. Pronai on behalf of Madison County Commissioners