

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Services and Related Matters	:	Case No. 21-637-GA-AIR
	:	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation	:	Case No. 21-638-GA-ALT
	:	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of a Demand Side Management Program for its Residential and Commercial Customers	:	Case No. 21-639-GA-UNC
	:	
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods	:	Case No. 21-640-GA-AAM
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**THE OHIO ENERGY GROUP'S  
MOTION FOR LEAVE TO INTERVENE**

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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,

/s/ Michael L. Kurtz

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June 3, 2021

**COUNSEL FOR THE OHIO ENERGY GROUP**

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

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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, a Cleveland-Cliffs Company, Amsted Rail Company, Inc., Cleveland-Cliffs Steel LLC (formerly ArcelorMittal), Ford Motor Company, General Motors LLC, Johns Manville (Berkshire Hathaway), Materion Corporation, Stellantis (formerly Fiat-Chrysler) 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,

/s/ Michael L. Kurtz

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**COUNSEL FOR THE OHIO ENERGY GROUP**

June 3, 2021

## **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 on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 3<sup>rd</sup> day of June, 2021 to the following:

/s/ Michael L. Kurtz

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**Case No(s). 21-0637-GA-AIR, 21-0638-GA-ALT, 21-0639-GA-UNC, 21-0640-GA-AAM**

Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group