

**BEFORE
THE PUBLIC UTILITIES 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)	Case No. 21-637-GA-AIR
Charges for Gas Services and Related Matters.)	
In The Matter of The Application of Columbia)	
Gas of Ohio, Inc. for Approval of an)	Case No. 21-638-GA-ALT
Alternative form of Regulation.)	
In The Matter of The Application of Columbia)	
Gas of Ohio, Inc. for Approval of a Demand)	
Side Management Program for Its Residential)	Case No. 21-639-GA-UNC
and Commercial Customers.)	
In The Matter of The Application of Columbia)	
Gas of Ohio, Inc. for Approval To Change)	Case No. 21-640-GA-AAM
Accounting Methods)	

**OHIO SCHOOL COUNCIL'S
MOTION TO INTERVENE**

Pursuant to R.C. 4903.221, and O.A.C. 4901-1-11, the Ohio Schools Council ("OSC") respectfully requests that the Public Utilities Commission of Ohio grant its motion to intervene in these proceedings. The reasons supporting OSC's motion to intervene are contained in the accompanying Memorandum in Support.

Respectfully submitted,



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**BEFORE
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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
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MEMORANDUM IN SUPPORT

The Ohio Schools Council (“OSC”) is a regional council of governments established under Chapter 167 of the Ohio Revised Code, and is a political subdivision of the State of Ohio. Since 1986, OSC has operated a natural gas program comprised of participating Ohio public school district members and other participants for the purpose of purchasing natural gas and obtaining natural gas cost savings. Through OSC’s efforts, it has realized significant energy cost savings for its members, thus conserving increasingly scarce public funds available for education in the State of Ohio.

OSC has operated natural gas purchase programs for public school districts in Columbia Gas of Ohio, Inc.’s. (“COH” or “Columbia”) service territory also since 1986, with COH providing transportation to members under various transportation rate tariffs. Columbia proposes to increase

these rates substantially in this case. OSC seeks intervention in this case to ensure that public school districts' interests in COH's service territory interests are protected.

OSC was granted intervention and has participated in prior COH matters before the Commission for nearly three decades, including the following rate cases and other proceedings: *Columbia Gas Ohio, Inc.*, Case No. 91-195-GA-AIR (November 27, 1991 Opinion & Order); *Columbia Gas Ohio, Inc.*, Case No. 94-987-GA-AIR (September 29, 1994 Opinion & Order); *Columbia Gas of Ohio, Inc.*, Case No. 08-1344-GA-EXM (December 2, 2009); and *Columbia Gas Ohio, Inc.*, Case No. 12-2637-GA-EXM (January 9, 2013 Opinion & Order); *Columbia Gas of Ohio, Inc.*, Case No. 98-593-GA-COI (June 18, 1998 Finding & Order). OSC also served on the Columbia Collaborative established in conjunction with Columbia's 1994 rate case, 94-987-GA-AIR.

On June 30, 2021, Columbia filed an application ("Application") to: (1) change its distribution rates; (2) modify its rate class structure; (3) make various other changes to its tariffs and accounting methods, recover approved cost deferrals since the last rate case; (4) and adopt new riders. Columbia's Application, if approved by the Commission, would impact the schools served by COH.

R.C. 4903.221(B) and OAC Rule 4901-1-11(A)(2) govern intervention in Commission proceedings. Substantially similar in substance, these provisions provide that the Commission may consider the following in determining whether to grant intervention:

- (1) The nature and extent of the person's interest;¹
- (2) The legal position of the person seeking intervention and its relation to the merits of the case;²
- (3) Whether intervention would unduly delay the proceeding or unjustly prejudice any existing party;³

¹ R.C. 4903.221(B)(1) and O.A.C. 4901-1-11(B)(1).

² R.C. 4903.221(B)(2) and O.A.C. 4901-1-11(B)(2).

- (4) The person's potential contribution to full development and equitable resolution of the issues involved in the proceeding;⁴ and
- (5) The extent to which the person's interest is represented by existing parties.⁵

OSC has a real and substantial interest in these proceedings considering that COH seeks to increase rates for OSC's members located in COH's territory. OSC has a substantial interest in ensuring that its school district members and other participants are charged just and reasonable rates by Columbia.

OSC's motion to intervene will not unduly delay these proceedings, or unjustly prejudice any existing party. OSC will work cooperatively with others in the case in order to maximize case efficiency, where practical, to reach an equitable resolution of all issues.

Finally, OSC submits that no current party represents its unique interests in assuring that rates to its members and program participants are just and reasonable. Disposition of these proceedings without its participation will impair or impede OSC's ability to protect those interests.

WHEREFORE, OSC respectfully requests that its motion to intervene be granted.

Respectfully submitted,



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³ R.C. 4903.221(B)(3) and O.A.C. 4901-1-11(B)(3).

⁴ R.C. 4903.221(B)(4) and O.A.C. 4901-1-11(B)(4).

⁵ O.A.C. 4901-1-11(B)(5).

and

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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* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 20th day of October 2021.



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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 to Intervene and Memorandum in Support by Ohio School Council
electronically filed by Teresa Orahod on behalf of Dane Stinson