

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of North Coast Gas)
Transmission, LLC for Authority to) Case No. 21-1029-GA-ATA
Operate as an Ohio Natural Gas)
Company.)

**MOTION TO INTERVENE OF
COLUMBIA GAS OF OHIO, INC.**

Pursuant to R.C. 4903.221 and Ohio Adm.Code 4901-1-11, Columbia Gas of Ohio, Inc. ("Columbia") moves to intervene in the instant case, in which North Coast Transmission, LLC ("North Coast") requests the authority to operate as an interstate natural gas company and for approval of a proposed tariff.

As set forth in the attached Memorandum in Support, Columbia has a real and substantial interest in the issues and matters involved in this proceeding, and is so situated that the disposition of this proceeding without Columbia's participation, may, as a practical matter, impair or impede Columbia's ability to protect that interest. Columbia's participation in this proceeding will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding. Therefore, Columbia respectfully requests that the Commission grant this request to intervene.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ John R. Ryan

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MEMORANDUM IN SUPPORT

On October 4, 2021, North Coast filed an application requesting, pursuant to R.C. 4905.02, 4905.03(E), and 4905.63, the authority to operate as an intrastate natural gas company in the state of Ohio and for approval of a proposed tariff (“Application”). On October 22, 2021, the Commission issued an Entry finding that “interested stakeholders should have the opportunity to offer comments, in light of the issues raised by the application.”¹ Columbia is a customer of North Coast and as a result, it has an interest in the merits of the Application.

R.C. 4903.221 and Ohio Adm.Code 4901-1-11(B) set forth the criteria by which a motion to intervene may be considered by the Commission in deciding whether to permit intervention:

- (1) The nature and extent of the prospective intervenor’s interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings;
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues; and
- (5) The extent to which the person’s interest is represented by existing parties.

¹ *In the Matter of North Coast Gas Transmission, LLC for Authority to Operate as an Ohio Natural Gas Company*, Case No. 21-1029-GA-ATA, Entry (Oct. 22, 2021) at 8.

Columbia satisfies each of these five criteria for intervention in this proceeding.

With respect to the first and second criteria, Columbia's interest in this Application and any legal position it will advance stem from the fact that it is a current customer of North Coast and Columbia's customers depend on the transmission service provided by North Coast. As the proposed tariff provisions in the Application will have a direct impact on this service, Columbia satisfies these intervention criteria.

Columbia accepts the current procedural posture of this case. As a result, intervention will not unduly prolong or delay the proceedings. Columbia and its representatives have extensive experience as participants in Commission proceedings, which can contribute to the development and resolution of this matter. Finally, no existing party to this proceeding represents Columbia's interests as related to its own utility business.

For the foregoing reasons, Columbia respectfully requests the Commission grant its motion to intervene.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ John R. Ryan

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 12th day of November, 2021 upon the parties listed below.

/s/ John R. Ryan
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Summary: Motion Motion to Intervene of Columbia Gas of Ohio electronically filed
by Mr. John R Ryan on behalf of Columbia Gas of Ohio