

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

**NORTH COAST GAS TRANSMISSION, LLC’S MEMORANDUM CONTRA TO THE
OFFICE OF THE OHIO CONSUMERS’ COUNSEL’S MOTION TO INTERVENE
AND
REQUEST FOR LIMITED INTERVENTION**

North Coast Gas Transmission, LLC (“North Coast”) submits this memorandum contra to the motion to intervene submitted by the Office of the Ohio Consumers’ Counsel. While North Coast does not oppose OCC’s motion to intervene, North Coast requests that OCC’s intervention be limited to the residential aspects of North Coast’s proposed tariff and service. OCC’s has authority under law to represent the interests of residential utility customers in Ohio, under R.C. Chapter 4911, but not that of commercial and industrial customers. As such OCC cannot have a real and substantial interest with respect to non-residential issues in this proceeding. Accordingly, pursuant to Rule 4901-1-11(D) of the Ohio Administrative Code, North Coast requests that the Attorney Examiner limit OCC’s intervention to only the interests it represents, that of residential utility customers and the residential portions of North Coast’s proposed tariff.

Respectfully submitted,

/s/ Michael J. Settineri

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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 certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 15th day of November 2021 upon all persons/entities listed below:

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in

Case No(s). 21-1029-GA-ATA

Summary: Memorandum Memorandum Contra to the Office of the Ohio
Consumers' Counsel's Motion to Intervene and Request for Limited Intervention
electronically filed by Mr. Michael J. Settineri on behalf of North Coast Gas
Transmission LLC