

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	Case No. 21-637-GA-AIR
Columbia Gas of Ohio, Inc. for Authority)	
to Amend its Filed Tariffs to Increase the)	
Rates and Charges for Gas Services and)	
Related Matters.)	

In the Matter of the Application of)	Case No. 21-638-GA-ALT
Columbia Gas of Ohio, Inc. for Approval)	
of an Alternative Form of Regulation.)	

In the Matter of the Application of)	Case No. 21-639-GA-UNC
Columbia Gas of Ohio, Inc. for Approval)	
of a Demand Side Management Program)	
for its Residential and Commercial)	
Customers.)	

In the Matter of the Application of)	Case No. 21-640-GA-AAM
Columbia Gas of Ohio, Inc. for Approval)	
to Change Accounting Methods.)	

**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
TO INTERVENE AND MEMORANDUM IN SUPPORT**

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MAY 6, 2022

COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

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Industrial Energy Users-Ohio ("IEU-Ohio") respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221 and Ohio Adm.Code 4901-1-11, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On June 30, 2021, Columbia Gas of Ohio ("Columbia Gas") filed an Application for Authority to Increase Rates, for Approval of an Alternative Rate Plan, for Approval of a Demand Side Management Program, and for Approval to Change Accounting Methods.

Columbia's application includes proposed changes to its demand side management plan and changes to riders and their rates. IEU-Ohio members include customers of Columbia that pay the rates subject to Columbia's application in this proceeding.

Accordingly, resolution of this matter may directly affect rates paid by IEU-Ohio members. As demonstrated further in the Memorandum in Support, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of Commission rules to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. IEU-Ohio's members purchase substantial amounts of natural gas, electric and related services from utilities regulated by the Commission, including from Columbia.

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked and will continue to

work to produce legislative, regulatory, and market outcomes that are consistent with the State policy contained in R.C. 4929.02.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of natural gas service to IEU-Ohio members' facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the natural gas supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

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COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

CERTIFICATE OF SERVICE

In accordance with Ohio Adm.Code 4901-1-05, 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 and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 6th day of May, 2022, via electronic transmission.

/s/ Matthew R. Pritchard

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**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/6/2022 3:53:54 PM

in

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

Summary: Motion to Intervene electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio