

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

**In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Approval of)
Demand Side Management Program for its) Case No. 16-1309-GA-UNC
Residential and Commercial Customers.)**

**In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Approval to) Case No. 16-1310-GA-AAM
Change Accounting Methods.)**

**MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (RESA)¹, pursuant to Section 4903.221 of the Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, moves for intervention in the above-styled proceeding. The reasons supporting the intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record.

Respectfully Submitted,
/s/ Michael J. Settineri
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¹ The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The standard for intervention at the Public Utilities Commission of Ohio (“Commission”) is governed by Rule 4901-1-11, Ohio Administrative Code, promulgated pursuant to Section 4903.221, Revised Code. Rule 4901-1-11, Ohio Administrative Code, states in part:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that:

* * *

(2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person’s interest is adequately represented by existing parties.

When deciding a motion to intervene, the factors that the Commission considers in implementing the above rule are the nature of the intervenor’s interest, the extent that interest is represented by existing parties, the intervenor’s potential contribution to a just and expeditious resolution of the issues involved, and whether intervention would result in an undue delay of the proceeding. *See also* Section 4903.221(B), Revised Code. A review of the intervention criteria in light of the following facts supports granting RESA’s intervention.

RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. Several RESA members are certificated as competitive retail natural gas (“CRNG”) service providers and active in the Ohio retail natural gas markets providing service to residential, commercial, industrial and governmental customers. In addition, some of RESA’s members currently provide CRNG service to retail customers in Columbia Gas of Ohio, Inc.’s (“Columbia”) service area.

In this proceeding, Columbia seeks approval to continue and expand its Demand Side Management (“DSM”) Program approved by the Commission in Case Nos. 08-833-GA-UNC, 11-5028-GA-UNC, and 11-5029-GA-AAM through calendar year 2022. Columbia proposes investing approximately \$26.8 million annually in its DSM Program, resulting in an annual cost increase of 3%. Columbia’s DSM Program includes a number of energy efficiency and weatherization initiatives, such as programs related to rebates on programmable thermostats and home energy reports, that are targeted to customers who may be served by RESA’s members.

RESA, on behalf of its members, submits that it has a direct, real and substantial interest in this proceeding and that it is so situated that the disposition of this proceeding without its participation may, as a practical matter, impair or impede its ability to protect that interest. RESA submits that it will not cause undue delay and 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.

WHEREFORE, RESA respectfully requests that it be permitted to intervene in this proceeding with the full powers and rights granted to intervening parties. The undersigned will accept service by electronic mail.

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 in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 27th day of July, 2016.

/s/ Michael J. Settineri

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