

**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 Charges for Gas Services and Related Matters.)))))	Case No. 21-637-GA-AIR
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation.)))	Case No. 21-638-GA-ALT
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
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.)))	Case No. 21-640-GA-AAM

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

Now comes the Retail Energy Supply Association (“RESA”)¹ who, pursuant to Ohio Revised Code Section 4903.221 and Ohio Administrative Code 4901-1-11, moves to intervene in the above-styled proceedings as a full party of record in all four cases. The reasons supporting the intervention are contained in the accompanying Memorandum in Support. RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record.

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 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.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

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**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE**

Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (“Rule”) 4901-1-11 establish the standard for intervention in the above-styled proceedings as a full party of record. Rule 4901-1-11 states in part:

(A) 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.

In addition to establishment of a direct interest, the factors that the Public Utilities Commission of Ohio (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* R.C. 4903.221(B) upon which the above rule is authorized. A review of these factors in light of the following facts supports granting RESA’s intervention.

RESA is a knowledgeable association of experienced retail energy suppliers. RESA and its members have been active in numerous Commission proceedings related to the retail electric and natural gas markets, and members are active suppliers providing service to residential, commercial, industrial and governmental customers in Ohio. RESA members are active participants in the competitive market in Columbia Gas of Ohio, Inc.’s service territory in particular and have participated in many of the utility’s cases at the Commission in the past.

In these proceedings, Columbia Gas of Ohio, Inc. (“Columbia”) seeks approval of rate changes for its distribution service, authority to continue alternative rate plans for certain riders, authority to continue its demand side management program, and authority for other tariff changes, among other things. With members who are active competitive suppliers operating in the utility’s choice program, RESA has a direct interest in how rates, terms and conditions are established.

Several specific proposals may affect RESA’s members. First, Columbia proposes to change the volumetric “breakpoint” that distinguishes whether customers would receive general services or small services.² This rate design change is a customer re-classification that has an impact on suppliers, as well as the utility’s cost allocation and cost recovery. Second, Columbia Gas proposes to add language in numerous parts of its tariff that would effectively sanction “revenue guarantees” for the utility when a customer has one or more competitive alternatives available – including alternative supply offers from competitive suppliers.³ Third, Columbia proposes a new rider entitled “Carbon Reduction Rider” that allows customers to “fund a reduction” to their carbon output.⁴ RESA members offer carbon-neutral natural gas products and would be directly affected by this new rider proposal.

RESA’s interests are not represented by Columbia or by the other intervenors in these cases. RESA’s motion is timely (no deadline for intervention has been set) and thus, RESA’s participation will not unduly prolong or delay the proceedings. Additionally, RESA is knowledgeable of Columbia’s market and the issues involved with the services in these

² See Application Schedule E-2.1, at Section V Sheets 16, 18, Section VI at Sheets 49, 50, 53, 54, Section VII at Sheet 27 page 1; Feingold Prefiled Direct Testimony at 31-33.

³ See Application Schedule E-2.1, at Section V Sheets 17, 19, 20, Section VI at Sheets 49, 50, 53-55, 57, 58, Section VII at Sheet 25 pages 2, 3, Sheet 27 page 2, 3, Sheet 28 page 2.

⁴ See Application Schedule E-2.1, at Section V Sheet 30f, Section VI Sheet 80, Section VII at Sheet 29 page 12.

proceedings. RESA will contribute significantly to the full development and equitable resolution of the factual issues.

For all of these reasons, RESA satisfies the requirements for intervention in these Commission proceedings. RESA respectfully requests that the Commission grant this motion to intervene and that RESA be made a full party of record.

Respectfully Submitted,

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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 sent (via electronic mail) on the 20th day of August 2021 on all persons/entities listed below:

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