

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
The East Ohio Gas Company d/b/a ) Case No. 23-755-GA-ATA  
Dominion Energy Ohio for )  
Approval of a Revision to Its Tariff )

---

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

---

Now comes the Retail Energy Supply Association (“RESA”)<sup>1</sup> who, pursuant to Ohio Revised Code Section 4903.221 and Ohio Adm.Code 4901-1-11, moves to intervene in the above-captioned proceeding as a full party of record. The reasons supporting this request for intervention are contained in the attached Memorandum in Support. RESA respectfully requests that the Public Utilities Commission of Ohio (“Commission”) grant this motion to intervene because its members will be directly impacted by the proposed modifications to Dominion Energy Ohio’s tariff. For the reasons set forth above and in the attached Memorandum in Support, RESA respectfully requests that the Commission grant this motion and that RESA be made a full party of record.

Respectfully submitted,

/s/ Gretchen L. Petrucci  
Michael J. Settineri (0073369), Counsel of Record  
Gretchen L. Petrucci (0046608)  
Joshua R. Eckert (0095715)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street, Columbus, OH 43215  
Tel: 614-464-5462  
mjsettineri@vorys.com  
glpetrucci@vorys.com  
jreckert@vorys.com  
(All willing to accept service via e-mail)  
*Counsel for the Retail Energy Supply Association*

---

<sup>1</sup> 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](http://www.resausa.org).



certified as competitive retail and natural gas service suppliers and have been active in the Ohio retail electric and natural gas markets providing service to residential, commercial, industrial and governmental customers. They are active in the competitive markets throughout Ohio.

On July 14, 2023, Dominion Energy Ohio (“DEO”) filed an application to amend its tariff, seeking to add a “minimum stay” provision for governmental aggregators that return more than 5,000 customers to DEO’s standard service offer from an opt-out aggregation prior to its scheduled expiration. Such tariff provisions have the potential to harm the retail natural gas market in which RESA’s members conduct business. The Commission acknowledged the impact that such provisions can have on retail markets when it granted intervention to several competitive retail electric suppliers in proceedings on comparable tariff modifications previously proposed by the State’s electric distribution utilities (“EDUs”) and through its consideration of the comments filed by RESA and competitive retail electric suppliers in those proceedings. *See In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of Tariff Amendments*, Case Nos. 22-1127-EL-ATA, et al., Finding and Order at ¶ 6 (Mar. 8, 2023). RESA will be also affected by DEO’s similar proposal in this case. Accordingly, RESA has a direct and substantial interest in the outcome of this proceeding and wishes to protect its interests in this proceeding.

RESA’s members are knowledgeable of the competitive industry in Ohio and across the country. As a supplier organization, RESA can readily contribute to a just and expeditious resolution of the issues involved here impacting the competitive market for retail natural gas. RESA is not represented by any other party and its intervention will not result in undue delay of the proceeding as RESA has and will comply with all established deadlines in this proceeding. RESA’s intervention motion is timely filed as well.

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

Respectfully submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

Gretchen L. Petrucci (0046608)

Joshua R. Eckert (0095715)

Vorys, Sater, Seymour and Pease LLP

52 East Gay Street

Columbus, OH 43215

Tel: 614-464-5462

mjsettineri@vorys.com

glpetrucci@vorys.com

jreckert@vorys.com

(All willing to accept service via e-mail)

*Counsel for the Retail Energy Supply Association*

**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 15th day of September 2023 upon the persons listed below.

The East Ohio Gas Company d/b/a Dominion Energy Ohio	<a href="mailto:kennedy@whitt-sturtevant.com">kennedy@whitt-sturtevant.com</a> <a href="mailto:andrew.j.campbell@dominionenergy.com">andrew.j.campbell@dominionenergy.com</a>
Interstate Gas Supply, LLC	<a href="mailto:stacie.cathcart@igs.com">stacie.cathcart@igs.com</a> <a href="mailto:evan.betterton@igs.com">evan.betterton@igs.com</a>
Northeast Ohio Public Energy Council	<a href="mailto:dstinson@brickergraydon.com">dstinson@brickergraydon.com</a> <a href="mailto:dparram@brickergraydon.com">dparram@brickergraydon.com</a> <a href="mailto:gkrassen@nopec.org">gkrassen@nopec.org</a>
Staff of the Public Utilities Commission of Ohio	<a href="mailto:john.jones@OhioAGO.gov">john.jones@OhioAGO.gov</a>

/s/ Gretchen L. Petrucci  
\_\_\_\_\_  
Gretchen L. Petrucci