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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of the:

Application of Columbia Gas of Kentucky, Inc.)
For an Adjustment of Rates) Case No. 2013-00167

**REPLY OF STAND ENERGY CORPORATION TO THE RESPONSE AND
OBJECTION OF COLUMBIA GAS OF KENTUCKY, INC.
TO STAND ENERGY'S MOTION TO INTERVENE**

Pursuant to 807 KAR 5:001 §5(3), Stand Energy Corporation ("Stand Energy") submits this Reply to the Response and Objection to Stand Energy Corporation's Motion to Intervene filed by Columbia Gas of Kentucky, Inc. herein on July 9, 2013.

The Public Service Commission docket in this General Rate Case indicates that Stand Energy Corporation filed its Motion to Intervene and Supporting Memorandum with the Public Service Commission on June 18, 2013. The Original and ten (10) copies were filed with the Commission and copies were duly served on all parties.


Pursuant to 807 KAR 5:001 Section 5, paragraph 2, "*a party to a case shall file a response to a motion no later than seven (7) days from the date of filing of a motion.*" If Columbia Gas of Kentucky, Inc. intended to file an objection and response to Stand Energy Corporation's June 18, 2013 Motion to Intervene, it would have had to have done so on or before June 25, 2013 to be timely. The Certificate of Service on the filing by Columbia indicates July 9, 2013 as the filed date. As such, the Columbia Response and Objection is two weeks out of time and the motion should be summarily denied for that reason alone.

Substantively, it is in the best interests of Kentucky natural gas ratepayers to have greater participation in rate proceedings. For commercial and industrial customers (C & I), the Commission is aware that competition through gas transportation programs has resulted in gas cost savings in the overwhelming majority of states where gas transportation programs are developing. Further, members of the Kentucky Legislature have made clear their desire for more transparency in utility rate proceedings and to allow more parties to participate in rate proceedings when parties have unique knowledge and expertise to bring to the discussion.

All of these goals will be served by denying the out-of-time motion of Columbia Gas of Kentucky, Inc. and granting Stand Energy Corporation full intervention to allow a discussion of transportation issues and programs that Columbia provides in other natural gas utilities. Stand Energy will contribute useful information to the proceeding which will aid the Commission in its decision-making process, as well as reasonable substantive questions for public discussion.


Respectfully Submitted,

STAND ENERGY CORPORATION

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Reply of Stand Energy Corporation has this 15th day of July been served upon the parties below via United States Postal Service First Class Mail postage prepaid.


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