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June 12, 2013

Via Hand-Delivery

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Re: Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates; Case No. 2013-00167

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of the Motion for Full Intervention on behalf of Interstate Gas Supply, Inc.

Thank you for your attention to the foregoing, please call me with any questions or concerns.

Very truly yours,
HURT, CROSBIE & MAY, PLLC



Matthew Malone

C: File

Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 12 2013

In the matter of: : CASE NO. 2013-00167 PUBLIC SERVICE
Adjustment of Rates : COMMISSION
Of Columbia Gas of Kentucky, Inc. :

INTERSTATE GAS SUPPLY, INC.'S MOTION TO INTERVENE

Comes Interstate Gas Supply, Inc. ("IGS") pursuant to 807 KAR 5:001 Section 3(8), by counsel, and moves for full intervenor status in this action to the fullest extent permitted by law, on behalf of itself and those consumers that it serves through the Small Volume Gas Transportation Service ("Choice Program"). In support of this Motion, IGS states as follows:

On or about May 29, 2013, Columbia Gas of Kentucky, Inc. ("Columbia") filed an application for adjustment of its base rates. Within its application, Columbia proposes a three (3) year extension of the Choice Program. Likewise, Columbia proposes changes to the Choice Program to address clarity and transparency questions. IGS is the main supplier in the Columbia Choice Program and supplies tens of thousands of natural gas customers at the residential and small commercial customer level through the Choice Program.

The Choice Program allows Columbia customers to decide who delivers natural gas for their home or business and IGS is the largest competitive supplier in the Choice Program.

The application proposed by Columbia involves continuation of the Choice Program along with changes to the Choice Program and, as such, will directly impact IGS, current Choice Program customers, and future Choice Program customers. Accordingly, IGS and its customers have a *special* interest in these proceedings. The Commission should thus grant IGS' Motion for full intervention status so IGS can evaluate all submissions made by Columbia (and others) to represent the interests of IGS and its current and potential customers. IGS has also frequently

intervened in previous Columbia base rate applications such as Case No. 2007-0008 and Case No. 2009-00141 along with several other dockets. IGS has experience in proceedings such as this current one at bar and will likely present expert testimony regarding the Choice Program and other issues relevant to this case. Accordingly IGS is, by any reasonable measure, *“likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.”*¹

Wherefore, IGS respectfully requests that it be permitted to fully intervene in the above-referenced matter.

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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Counsel for the Petitioner,
INTERSTATE GAS SUPPLY, INC.

¹ 807 KAR 5:001 §3(8)(b).

CERTIFICATE OF SERVICE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, all on this 12 day of June, 2013.

Hon. Stephen B. Seiple
Hon. Brooke E. Leslie
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