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MAR 15 2017

PUBLIC SERVICE
COMMISSION

March 15, 2017

Via Hand-Delivery

Ms. Talina R. Matthews
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Re: Tariff Filing of Columbia Gas of Kentucky, Inc. to Extend Its Small
Volume Gas Transportation Service; Case No. 2017-00115

Dear Ms. Matthews:

Enclosed you will find an original and ten (10) copies of Interstate Gas Supply Inc.'s Motion to Intervene in the above-referenced matter. Please place the document of file and please contact me with any questions or concerns.

Very truly yours,
HURT, DECKARD & MAY, PLLC



Matthew Malone

C: File; Hon. Brooke E. Wancheck
Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAR 15 2017

In the matter of: : CASE NO. 2017-00115
TARIFF FILING OF COLUMBIA GAS OF :
KENTUCKY, INC. TO EXTEND ITS SMALL :
VOLUME GAS TRANSPORTATION :
SERVICE :

PUBLIC SERVICE
COMMISSION

INTERSTATE GAS SUPPLY, INC.'S MOTION TO INTERVENE

Comes Interstate Gas Supply, Inc. ("IGS"), 6100 Emerald Parkway, Dublin, OH 43016, pursuant to 807 KAR 5:001 Section 4(11), by counsel, and moves that it be granted leave to intervene in this action and that it be granted full intervention status. IGS is the largest gas supplier of the Small Volume Gas Transportation Service ("Choice Program"). In support of this Motion, IGS states as follows:

On or about March 1, 2017, Columbia Gas of Kentucky, Inc. ("Columbia") submitted a tariff filing to continue its Small Volume Gas Transportation Service tariff and Small Volume Aggregation Service tariff, otherwise known as the "CHOICE program" for five (5) years. *Sua sponte*, the Commission then decided an investigation is necessary to determine the reasonableness of the proposed tariffs to extend the CHOICE program. *See*, Order herein, dated March 8, 2017. IGS supports Columbia's filing and is supportive of the request to extend CHOICE.

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 investigation proposed by the Commission involves potential changes to the Choice Program and the reasonableness of rates and, as such, will directly impact IGS, current Choice

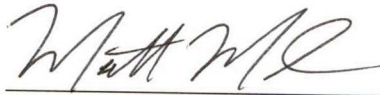
Program customers, and future Choice Program customers and IGS's interests are not adequately represented by the other parties to this proceeding. And, anyone seeking to intervene must have an interest in the "rates" or "service" of a utility. KRS 278.040(2). KRS 278.010(12) defines "Rate" as any...charge...for service rendered or to be rendered by any utility, and any...rule, regulation, practice, act...or privilege in any way relating to such...charge...and any schedule or tariff or part of a schedule or tariff thereof. Consideration by the Commission of the CHOICE program "Rates" and the reasonableness thereof, potentially affects IGS and its fixed contracts provided by IGS to its customers. Accordingly, IGS has a *special* interest in the "Rates" in this proceeding. KRS 278.010(12).

Inasmuch, the Commission should thus grant IGS' Motion for intervention status so IGS can evaluate all submissions made by Columbia (and others) to represent the interests of IGS. IGS has also frequently intervened in previous Columbia applications such as Case No. 2007-0008, Case No. 2009-00141, Case No. 2013-00167 along with several other dockets which Columbia was a party (e.g. *An Investigation Into Natural Gas Retail Gas Competition Programs*, Case No. 2010-00146). 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 intervene in the above-referenced matter.

Respectfully submitted,

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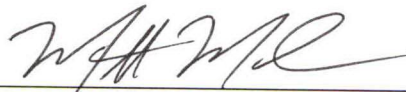
Counsel for the Petitioner,
INTERSTATE GAS SUPPLY, INC.

CERTIFICATE OF SERVICE

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served via hand-delivery upon Dr. Talina Mathews, 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 15th day of March, 2017.

Hon. Stephen B. Seiple
Hon. Brooke E. Wancheck
Columbia Gas of Kentucky, Inc.
290 W. Nationwide Blvd.
Columbus, Ohio 43215

Hon. Richard S. Taylor
225 Capital Avenue
Frankfort, Kentucky 40601



ATTORNEY FOR INTERSTATE GAS SUPPLY, INC.

¹ 807 KAR 5:001 §4(11)