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March 17, 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 the Retail Energy Supply Association'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.

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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

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**MOTION OF RETAIL ENERGY SUPPLY ASSOCIATION FOR FULL  
INTERVENTION**

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Pursuant to 807 KAR 5:001 Section 4(11), by counsel, the Retail Energy Supply Association, Inc. (“RESA”), P.O. Box 6089, Harrisburg, PA 17112 hereby moves that it be granted leave to intervene in this matter and that it be granted full intervenor status in the above-captioned proceeding.

RESA is a non-profit 501(c)(6) trade association of independent corporations that are among the largest retail suppliers of natural gas and electricity in the United States<sup>1</sup>. RESA’s goals and interest as a trade association of retail energy suppliers would bring a broad spectrum of experience to this proceeding which is not otherwise adequately represented by any other party or prospective party in the above-captioned case. RESA’s participation will likely lead to the presentation of relevant facts and issues that will assist the Commission in addressing the reasonableness of the proposed tariffs to extend the CHOICE program filed by Columbia Gas of

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (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 more than twenty 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).

Kentucky, Inc. (“Columbia”). RESA’s participation will not unduly complicate, disrupt or delay the proceedings. In support of the foregoing motion, RESA states as follows:

1. RESA’s participation in this proceeding will provide the Commission with the important viewpoint of an association that specifically represents the interest of national retail gas and electricity suppliers. RESA has unique experience in working to open and maintain competitive markets throughout the United States, and can bring real world knowledge and experience from other states’ successes and failures.

2. RESA as a trade association of retail energy suppliers has information and experience that is not possessed by any other party.

3. RESA has prior experience before the Commission herein having intervened in *An Investigation Into Natural Gas Retail Gas Competition Programs*, Case No. 2010-00146.

4. RESA supports Columbia’s filing to extend the existing CHOICE Program.

5. Anyone seeking to intervene must have an interest in the “rates” or “service” of a utility. KRS 278.040(2). The investigation by the Commission into the reasonableness of the proposed tariffs/rates to extend the CHOICE program involves potential changes to the CHOICE Program and thus directly impacts RESA members and therefore RESA has a *special* interest in the rates in this proceeding. KRS 278.010(12).

6. RESA has experience in proceedings such as this current one at bar and will likely present expert testimony, if requested or if the procedural schedule changes regarding testimony, regarding the Columbia CHOICE Program and other issues relevant to the case. RESA is by any means likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings. 807 KAR 5:001 §4(11).

WHEREFORE, RESA respectfully requests that it be permitted to intervene in the above-referenced matter.

Respectfully submitted,



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ATTORNEYS FOR RETAIL ENERGY  
SUPPLY ASSOCIATION

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on this the 17th day of March, 2017, the original and ten (10) copies of the foregoing were hand-delivered to the Commission for filing, and that a copy was served via U.S. Mail, first class and postage prepaid, to the following:

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



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Attorney for Retail Energy Supply Association