

# HURT, CROSBIE & MAY PLLC

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November 6, 2008

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NOV 06 2008

PUBLIC SERVICE  
COMMISSION

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

RE: *Case No. 2008-00433 (Application of Columbia Gas of Kentucky, Inc. to  
Extend Its Gas Cost Incentive Program & Off-System Sales and Capacity  
Release Revenue Sharing)*

Dear Ms. Stumbo:

Please find enclosed herewith for filing an original and 10 copies of Interstate Gas Inc.'s Motion to Intervene in Columbia Gas Inc.'s Application in the above-referenced matter. Please contact me should you have any questions or concerns.

Regards,



Matthew Malone

Enclosures

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the matter of:** :

**Case No. 2008-00433**

**Application Of Columbia Gas of Kentucky, Inc. :**  
**To Extend Its Gas Cost Incentive Program :**  
**And Its Off-System Sales and Capacity Release :**  
**Revenue Sharing Mechanism :**

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**PUBLIC SERVICE  
COMMISSION**

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**INTERSTATE GAS SUPPLY, INC.'S MOTION TO INTERVENE**

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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 customers that it serves through the Customer Choice Program ("Choice Program"). In support of this Motion, IGS states as follows:

The Choice Program allows Columbia Gas Inc. ("Columbia") customers to decide who supplies natural gas for their home or business. IGS is the largest competitive supplier in the Choice Program and serves over 20,000 customers through the program. As such, IGS has a special interest in aspects of the Columbia program that impact IGS customers. Since Choice customers receive some of the benefit of off-system sales revenues, IGS is uniquely situated to represent its and its customers' interests regarding issues that might arise in this docket.

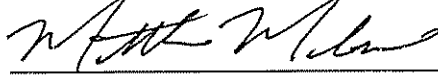
These proceedings could also involve other issues of critical importance to IGS, its current customers and future customers.

Full intervention by IGS will assist the Commission in considering this matter without unduly complicating these proceeds and IGS and its customers have a special interest in these proceedings.

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

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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Counsel for the Petitioner,  
**INTERSTATE GAS SUPPLY, INC.**

Of Counsel:

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5020 Bradenton Avenue

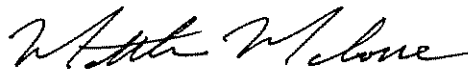
Dublin, Ohio 43017

### **CERTIFICATE OF SERVICE**

I hereby certify that an original and ten (10) copies of this Motion to Intervene were served via hand-delivery upon Stephanie Stumbo, 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 6<sup>th</sup> day of November, 2008.

Hon. Stephen B. Seiple  
Hon. Mark R. Kempic  
Hon. Daniel A. Creekmur  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
P.O. Box 117  
Columbus, Ohio 43216-0117

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



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ATTORNEY FOR INTERSTATE GAS SUPPLY, INC.