

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

Application of Columbia Gas of Kentucky, :  
Inc. for an Adjustment of Rates : Case No. 2016-00162

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**MOTION OF DIRECT ENERGY BUSINESS MARKETING, LLC  
FOR FULL INTERVENTION**

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Pursuant to 807 KAR 5:001 § 4(11) and the Order of the Kentucky Public Service Commission (“Commission”) entered June 10, 2016, Direct Energy Business Marketing, LLC (“Direct Energy”) hereby moves for full intervenor status in the above-captioned proceeding. In support of its intervention, Direct Energy states as follows:

1. On May 27, 2016, Columbia Gas of Kentucky, Inc. (“Columbia” or “Company”) filed an Application to the Kentucky Public Service Commission, pursuant to KRS § 278.180 and KRS § 278.190, for an increase in its base rates for gas distribution service. Columbia also requested approval of additional changes to its existing tariffs and permission to defer certain incremental expenses.

2. Direct Energy currently serves transportation customers and commercial and industrial customers behind Louisville Gas and Electric Company, Delta Natural Gas Company, Atmos Energy Corporation, and Duke Energy Kentucky. Direct Energy is a North American affiliate of Centrica plc, a leading international provider of energy and other energy-related services with over 28 million customer relationships worldwide. Direct Energy provides electricity, natural gas and other energy services to more than 5 million residential homes and businesses across North America. Direct Energy has a unique business model, and extensive experience in providing innovative gas and electricity products and services to residential, small

and large commercial and industrial customers, utilities, and government entities. Direct Energy, through its acquisition of Hess Energy Marketing, is the largest business gas supplier (by volume) in the eastern United States.

3. Direct Energy's attorney in this matter is:

Gabriella Cellarosi Daniel, Esquire  
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4. While Direct Energy does not currently serve customers through Columbia's Choice Program, the outcome of this proceeding could impact whether Direct Energy participates in the program in the future.

5. Direct Energy will be bound by the action of the Commission in this proceeding as well as the terms and conditions for Columbia's rates and programs. The Commission's actions regarding the Company's proposals could have a substantial impact on Direct Energy's future involvement in the market.

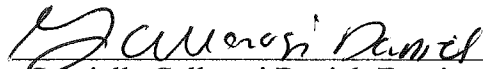
6. Direct Energy has differing goals and interests than Kentucky's regulated natural gas utilities, the Kentucky Attorney General, or any other party or prospective party in the above-captioned case and therefore no other participant can adequately represent or protect the interests of Direct Energy.

7. It should be noted that Direct Energy is actively participating in Columbia Gas of Pennsylvania, Inc.'s rate proceeding. Direct Energy's participation in this proceeding will lead to the presentation of relevant facts and issues that will assist the Kentucky Public Service Commission in the investigation of Columbia Gas of Kentucky, Inc.'s proposed adjustment of

rates without unduly complicating, disrupting or delaying the proceedings.

**WHEREFORE**, Direct Energy respectfully requests that the Commission grant Direct Energy full intervenor status.

Respectfully submitted,



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Date: June 27, 2016

Counsel for Direct Energy Business Marketing, LLC

**FILING NOTICE AND CERTIFICATE**

I hereby certify that this Motion to Intervene is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document); that the electronic submission of these documents to the Commission was performed on June 27, 2016; that copies of these documents were sent via federal express to the Kentucky Public Service Commission on June 27, 2016; and that currently, no party has been excused from participation by electronic service.

Dated: June 27, 2016

  
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Gabriella Cellarosi Daniel, Esq.

Counsel for Direct Energy Business Marketing, LLC