

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

In the matter of: : CASE NO. 2016-00162
The Application of Columbia Gas of :
Kentucky, Inc. for an Adjustment of Rates :

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 May 27 2016, Columbia Gas of Kentucky, Inc. (“Columbia”) filed an application for adjustment of its base rates. In its Application Columbia is proposing changes to its tariff that would allow Columbia to modify the delivery points for Choice suppliers which could affect the costs suppliers pay to deliver gas to Columbia. Further, Columbia is proposing changes to the cash-out mechanism for transportation customers that are served by competitive suppliers. 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 application proposed by Columbia involves changes to the Choice Program 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. Accordingly, IGS has a *special* interest in these proceedings. The Commission should thus grant IGS’ Motion for intervention status so IGS can evaluate all submissions made

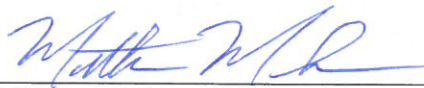
by Columbia (and others) to represent the interests of IGS. IGS has also frequently intervened in previous Columbia base rate applications such as Case No. 2007-0008, Case No. 2009-00141, Case No. 2013-00167 along with several other dockets. IGS has experience in proceedings such as this current one 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

Lastly, pursuant to 807 KAR 5:001 Section 8, IGS certifies that it and its authorized agents possess the facilities to receive electronic transmissions and waives any right to receive service of Commission Orders by United States mail. In this proceeding, please forward all electronic messages to counsel at the email address: mmalone@hdmfirm.com.

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

Respectfully submitted,

HURT, DECKARD & MAY PLLC



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Counsel for the Petitioner,
INTERSTATE GAS SUPPLY, INC.

¹ 807 KAR 5:001 §4(11)

CERTIFICATE OF SERVICE

I hereby certify that IGS' June 27, 2016 electronic filing is a true and accurate copy of IGS' Motion to Intervene and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 27, 2016; that an original and one copy of the filing will be delivered to the Commission on June 27, 2016; that there are currently no parties excused from participation by electronic service; and that, on June 27, 2016, electronic mail notification of the electronic filing is provided 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

Hon. David J. Barberie
Department of Law
200 East Main Street
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