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*Via E-filing and UPS*

March 19, 2012

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: Joint Petition Requesting the Pennsylvania Public Utility Commission  
Institute a Generic Investigation or Rulemaking Concerning "Gas on  
Gas Competition" Between Jurisdictional Natural Gas Companies  
Docket No. P-2011-2277868**

Dear Secretary Chiavetta:

Enclosed for filing please find Columbia Gas of Pennsylvania, Inc.'s Petition to Intervene in the referenced matter.

As indicated on the certificate of service, copies have been served on the parties.

Respectfully submitted,



Theodore J. Gallagher

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Requesting that the Pennsylvania :  
Public Utility Commission Institute a Generic :  
Investigation or Rulemaking Concerning “Gas : P-2011-2277868  
on Gas Competition” Between Jurisdictional :  
Natural Gas Distribution Companies :

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**PETITION TO INTERVENE OF  
COLUMBIA GAS OF PENNSYLVANIA, INC.**

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NOW COMES Columbia Gas of Pennsylvania, Inc. (“Columbia”), by and through counsel, and pursuant to 52 Pa. Code § 5.71, et seq., petitions for admission as an intervenor in the captioned proceeding. In support of its intervention, Columbia states as follows:

1. Columbia is a Pennsylvania corporation incorporated June 21, 1960 under the Act of May 29, 1885, P.L. 29, and provides service pursuant to certificates of public convenience issued by the Commission in proceedings docketed at A. 87616, A. 95490, and A. 96176, which are incorporated herein by reference. As of December 31, 2010, Columbia served approximately 414,000 residential, commercial, and industrial customers in portions of 26 counties in Pennsylvania, primarily in the western half of the state, as well as parts of northwest, southern, and central Pennsylvania. Columbia has its principal office in Canonsburg, Pennsylvania.

2. The name and address of Petitioner are:

Columbia Gas of Pennsylvania, Inc.  
121 Champion Way, Suite 100  
Canonsburg, PA 15317

3. The name, address, e-mail address, and telephone and facsimile numbers of Petitioner's counsel are:

Theodore J. Gallagher  
Senior Counsel  
NiSource Corporate Services Company  
121 Champion Way, Suite 100  
Canonsburg, PA 15317  
tjgallagher@nisource.com  
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4. On or about December 8, 2011, Peoples Natural Gas ("Peoples"), the Bureau of Investigation and Enforcement ("BI&E"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA") jointly filed a Petition for Generic Investigation or Rulemaking Regarding "Gas on Gas Competition" Between Jurisdictional Natural Gas Distribution Companies ("Joint Petition").

5. The Joint Petition was filed pursuant to an approved settlement of Peoples base rate proceeding at Docket No. R-2010-2201702, whereby Peoples, BI&E, OCA, and OSBA agreed to address "gas-on-gas competition" issues by requesting that the Commission review the effect of distribution rate competition among Natural Gas Distribution Companies ("NGDCs") on a generic basis for all NGDCs, as more fully described in paragraphs 4 through 6 of the Joint Petition.

6. As noted in paragraph 8c. of the Joint Petition, the Joint Petition for Partial Settlement in Columbia's most recent base rate proceeding at Docket No. R-2010-2215623

also addressed the issue of gas-on-gas competition, and included a similar provision to the Peoples rate case settlement. Specifically, the Columbia partial settlement provided, in relevant part:

Columbia agrees to join with [BI&E], OCA and/or OSBA in a request that the Commission initiate a generic investigation or rulemaking to address whether flex discounts solely as a result of competition from other NGDCs should be permitted to continue and, if permitted to continue, under what circumstances it will be considered appropriate.

The Commission approved the Joint Petition for Partial Settlement by Order entered October 14, 2011.

7. Columbia concurs with the matters stated in paragraphs 10 through 13 of the Joint Petition, which advocate for the resolution of NGDC competition issues by way of a generic investigation or rulemaking rather than individual NGDC base rate proceedings. As noted in the Joint Petition, separately resolving NGDC competition issues in individual base rate proceedings could lead to disparate regulatory treatment of various NGDCs that could continue for several years.

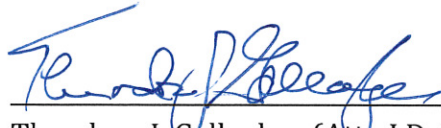
8. Columbia submits that, as described above, it has an interest that may be directly affected by the Joint Petition. Columbia further submits that it may be bound by the Commission's action in this proceeding, and that its interests are not adequately represented by any other party.

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Commission grant its petition to intervene in the above-captioned proceeding.

Respectfully submitted,

COLUMBIA GAS OF PENNSYLVANIA, INC.

By:



Theodore J. Gallagher (Atty I.D. No. 90842)

Senior Counsel

NiSource Corporate Services Company

121 Champion Way, Suite 100

Canonsburg, PA 15317

Attorney for

Columbia Gas of Pennsylvania, Inc.

Dated: March 19, 2012

**VERIFICATION**

I, Mark R. Kempic, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 3/16/12

Mark R Kempic  
Mark R. Kempic  
Director, Rates & Regulatory Policy  
Columbia Gas of Pennsylvania, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, this 19th day of March, 2012:

**VIA FIRST CLASS MAIL**

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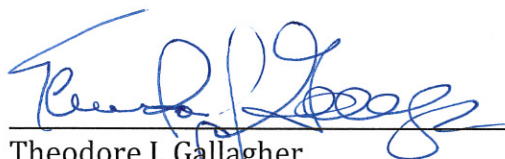
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