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August 12, 2009

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of Metropolitan Edison Company for Approval  
of its Energy Efficiency and Conservation Plan  
Docket No. M-2009-2092222**

Dear Mr. McNulty:

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

Should you have any questions concerning this matter, please feel free to call me at 724.416.6355 or e-mail me at [tjgallagher@nisource.com](mailto:tjgallagher@nisource.com).

I thank you for your assistance.

Sincerely,

Theodore J. Gallagher

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Petition of Metropolitan Edison</b>	<b>:</b>	
<b>Company for Approval of its</b>	<b>:</b>	<b>Docket No. M-2009-2092222</b>
<b>Energy Efficiency</b>	<b>:</b>	
<b>And Conservation Plan</b>	<b>:</b>	

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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 to intervene in the captioned proceeding. In support of its petition to intervene 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, 2008, Columbia served approximately 413,000 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.  
501 Technology Drive  
Canonsburg, PA 15317

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

Theodore J. Gallagher  
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NiSource Corporate Services Company  
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4. On or about July 1, 2009, Metropolitan Edison Company ("Met-Ed") filed its Act 129 Energy Efficiency and Conservation Plan ("EEC Plan") with the Pennsylvania Public Utility Commission.

5. Perusal of the tariffs under which Columbia and Met-Ed operate, respectively, demonstrates a significant amount of overlap in their service territories. Moreover, Columbia is a Met-Ed customer. Columbia claims a right to intervene by virtue of an interest in this matter that is of such nature that its intervention is necessary or appropriate to the administration of Act 129, in that: its interest in this matter is not adequately represented by existing parties, and Columbia may be bound by the action of the Commission in this proceeding, and; its participation will be in the public interest. 52 Pa. Code § 5.72(a)(2), (3).

Columbia is mindful of the fact that this petition to intervene is untimely.

However, Columbia agrees to accept the record as it stands and it will comply with the established procedural schedule. Nor does it intend to expand the scope of issues that have already been introduced in this matter. Thus, no party will be prejudiced by Columbia's participation in this proceeding.

6. Under Act 129, electric distribution company (EDC) energy efficiency and conservation plans must include "a variety of energy efficiency and conservation measures" that will reduce electric consumption and peak demand 66 Pa.C.S. § 2806.1(a)(5), (c), (d). Consistent with Act 129's directive regarding a 'variety' of measures, Columbia submits that a proper ECC Plan should include some fuel substitution measures, including natural gas, where appropriate.

7. Columbia submits that the use of natural gas as a means of reducing electric consumption and demand should be considered in this matter, since a natural gas option may positively impact the cost of Act 129 compliance that will ultimately be borne by Met-Ed's customers. Once approved, Met-Ed's ECC Plan will not readily be subject to amendment. Consequently, due consideration must be given to the use of natural gas as an alternate fuel at the implementation phase of the ECC Plan.

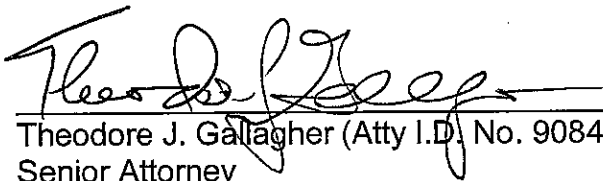
8. Columbia seeks to intervene in this matter so that the use of additional fuel substitution measures in Met-Ed's ECC Plan, particularly natural

gas, is given due consideration. The inclusion of additional fuel substitution measures in the ECC Plan will not only assist in complying with Act 129's consumption and demand reduction mandates, but will also inure to the benefit of customers in the form of downward pressure on wholesale electric and natural gas prices. Since Columbia provides natural gas service to a large number of customers in Met-Ed's service territory, its participation in this matter will serve to promote the consideration of natural gas as an alternative fuel source to assist in electric consumption and demand reduction by Met-Ed's customers. Thus, Columbia's intervention in this matter is in the public interest. Moreover, Columbia's interest in this matter is not adequately represented by any other party or participant.

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Commission approve this petition and grant it leave to intervene and admit it as a party in the above-captioned proceeding.

Respectfully submitted,

COLUMBIA GAS OF PENNSYLVANIA, INC.

By:   
Theodore J. Gallagher (Atty I.D. No. 90842)  
Senior Attorney  
NiSource Corporate Services Company  
501 Technology Drive  
Canonsburg, PA 15317


Attorney for  
Columbia Gas of Pennsylvania, Inc.

Dated: August 12, 2009

**VERIFICATION**

I, P. David Haddad, 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: August 12, 2009



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P. David Haddad  
Director, 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 12<sup>th</sup> day of August, 2009:

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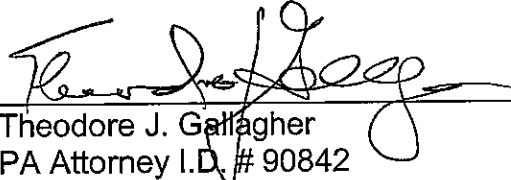
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