## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Increase Rates for its Gas Distribution Service.

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Alternative Rate Plan for its Gas Distribution Service

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Change Accounting Methods

In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with Automated Meter Reading Deployment Through an Automatic Adjustment Clause, and for Certain Accounting Treatment.

Case No. 07-829-GA-AIR

Case No. 07-830-GA-ALT

Case No. 07-831-GA-AAM

Case No. 06-1453-GA-UNC

## MOTION TO CONSOLIDATE

The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO" or "Company"), pursuant to Rules 4901-1-12 and 4901-1-14, Ohio Administrative Code ("O.A.C."), respectfully requests issuance of an Entry consolidating the Company's application in Case No. 06-1453-GA-UNC ("AMR Application") with the Company's application to increase rates, for approval of an alternative rate plan and for approval of a change in accounting methods filed in Case Nos. 07-829-GA-AIR, 07-830-GA-ALT and 07-831-GA-AAM ("Rate Case Application").

The AMR Application was filed on December 13, 2006. In that application, DEO requests approval of tariffs to recover certain costs associated with automated meter reading ("AMR") deployment through an automatic adjustment clause. Subsequently, on August 30, 2007, DEO filed its Rate Case Application. In the Rate Case Application, DEO proposes to implement the AMR program previously described in the AMR Application. Rather than proceed with the AMR Application separately, DEO requests that the Commission consolidate that AMR Application with the Rate Case Application. Consolidating these applications would promote conservation of Commission resources without prejudicing any party. Accordingly, DEO respectfully requests that the Commission grant this Motion.

Respectfully submitted,

David A. Kutik

**JONES DAY** 

North Point, 901 Lakeside Avenue

Cleveland, Ohio 44114-1190

Telephone: (216) 586-3939

Facsimile: (216) 579-0212 dakutik@jonesday.com

Christopher W. Flynn

JONES DAY

77 West Wacker

Chicago, Illinois 60601-1692

Telephone: (312) 782-3939

Facsimile: (312) 782-8585

cwflynn@jonesday.com

Mark A. Whitt (Counsel of Record)

Andrew J. Campbell

JONES DAY

Mailing address:

P.O. Box 165017

Columbus, Ohio 43216-5017

Street address:

325 John H. McConnell Blvd., Suite 600

Columbus, Ohio 43215-2673 Telephone: (614) 469-3939

Facsimile: (614) 461-4198 mawhitt@jonesday.com ajcampbell@jonesday.com

Jean A. Demarr THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO 1201 East 55th Street

Cleveland, Ohio 44101

Telephone: (216) 736-6334 Facsimile: (216) 736-5308 Jean.A.Demarr@dom.com

ATTORNEYS FOR THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Consolidate was sent by ordinary U.S. mail to the following parties on this 20th day of September, 2007.

Interstate Gas Supply, Inc.
John Bentine, Esq.
Chester, Wilcox & Saxbe LLP
65 East State Street, Suite 1000
Columbus, OH 43215-4213

Office of the Ohio Consumers Counsel Joseph Serio, Esq. 10 West Broad Street, Suite 1800 Columbus, OH 43215-3485

Ohio Partners for Affordable Energy David Rinebolt, Esq. P.O. Box 1793 Findlay, OH 45839-1793

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The Neighborhood Environmental Coalition, The Empowerment Center of Greater Cleveland, The Cleveland Housing Network, and The Consumers for Fair Utility Rates Joseph Meissner, Esq. The Legal Aid Society of Cleveland 1223 West 6th Street Cleveland, OH 44113

Ohio Energy Group David Boehm, Esq. 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

Dominion Retail Barth E. Royer 33 South Grant Avenue Columbus, OH 43215-3927