

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East )  
Ohio Gas Company d/b/a Dominion East Ohio ) Case No. 07-829-GA-AIR  
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 ) Case No. 07-830-GA-ALT  
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 ) Case No. 07-831-GA-AAM  
for Approval to Change Accounting Methods. )

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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF INDUSTRIAL ENERGY USERS-OHIO**

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**September 24, 2007**

**Attorneys for Industrial Energy Users-Ohio**

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**MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO**

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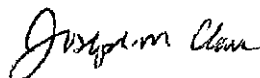
Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On August 30, 2007, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") filed an Application for authority to increase rates for gas distribution service, approval of an alternative rate plan, and approval to change accounting methods.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceedings, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability

to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of IEU-Ohio will not be adequately represented by other parties to the proceedings and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code to intervening parties.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT**

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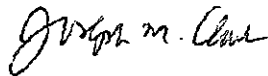
In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at [http://www.ieu-ohio.org/public/about\\_ieu-ohio/members](http://www.ieu-ohio.org/public/about_ieu-ohio/members). IEU-Ohio's members work together to address matters that affect the availability and price of utility services.

IEU-Ohio's members purchase substantial amounts of natural gas and related services from DEO, which is a public utility subject to the jurisdiction of the Commission. IEU-Ohio member company facilities are served on the tariffs that DEO proposes to change, including the general transportation service and daily transportation service tariffs.

Therefore, IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of natural gas service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in

these proceedings is the result of the effect that these proceedings shall have upon the price, adequacy, and reliability of the natural gas supply and related services within Ohio, including the areas presently served by DEO.

Respectfully submitted,



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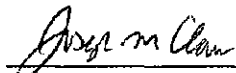
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**Attorneys for Industrial Energy Users-Ohio**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* were served upon the following parties of record this 24th day of September 2007, via first class mail, postage prepaid.



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