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SEC

STAND ENERGY CORPORATION

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November 20, 2007

VIA UPS OVERNIGHT DELIVERY

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, OH 43215-3793

Re: Case No. 07-829-GA-AIR
07-830-GA-ALT
07-831-GA-AAM


Ladies and Gentlemen:

Enclosed for filing are an original and ten copies of Stand Energy Corporation's Motion to Intervene Out of Time and Supporting Memorandum in the above-captioned cases.

Sincerely,

John M. Dosker
General Counsel

Enclosures

This is to certify that the images appearing are an
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Technician  Date Processed 11-21-07

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

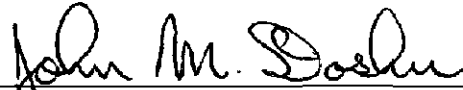
**MOTION OF STAND ENERGY CORPORATION
TO INTERVENE OUT OF TIME**

Stand Energy Corporation, by and through the undersigned counsel, pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, *et seq.* moves the Commission for Leave to Intervene, out of time, in the above-styled and numbered matter relating to the Application filed by Dominion East Ohio to approve an increase of its gas distribution rates, an alternative rate plan and to change accounting methods.

A Memorandum in Support of this motion is attached. Stand Energy accepts the record in this Docket as it exists on the date of this filing and is only requesting to participate from this point in the case forward. This filing and Stand Energy's participation in this case will not occasion any undue prejudice or delay to any other party.

Respectfully submitted,

STAND ENERGY CORPORATION

A handwritten signature in black ink, appearing to read "John M. Dosker", is written over a horizontal line.

John M. Dosker, Trial Attorney

General Counsel

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Ohio Gas Company d/b/a/ Dominion East)	Case No. 07-831-GA-AAM
Ohio for Approval to Change Accounting)	
Methods.)	

**MEMORANDUM IN SUPPORT OF STAND ENERGY CORPORATION'S
MOTION TO INTERVENE OUT OF TIME**

On July 20, 2007 The East Ohio Gas Company d/b/a/ Dominion East Ohio filed with the Commission, pursuant to O.A.C. 4901-7-1, a Pre-Filing Notice (hereinafter "Notice") of its intent to file an application for authority to increase its distribution rates and intent to file an application for approval of an alternative rate plan for its gas distribution service and for a change in accounting methods.

Stand Energy Corporation ("SEC"), is a Kentucky Corporation, with its primary office located at 1077 Celestial Street, Suite #110, Cincinnati, OH 45202-1629. SEC is engaged in the marketing of natural gas to numerous end use customers throughout Ohio, including industrial and commercial customers on the Dominion East Ohio system.

The grounds for this motion are that the application is for an increase in base distribution rates. The changes requested by Dominion will be detrimental to current Dominion transportation customers and the competitive market for natural gas in the Dominion service territory.

SEC has a real and substantial interest in these proceedings. Because of differing commercial goals and direction, SEC avers that no other potential participant can adequately represent its interests in this case. Pursuant to RC §4903.221 and OAC §4901-1-11, SEC respectfully requests that the Commission grant it full Intervenor status.

For purposes of considering requests for leave to intervene, OAC 4901-1-11(A) provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: ... (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, RC 4903.221 (B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

(1) The nature and extent of the prospective intervener's interest; (2) The legal position advanced by the prospective intervener and its probable relation to the merits of the case; (3) Whether the intervention by the prospective intervener will unduly prolong or delay the proceedings; (4) Whether the prospective intervener will significantly contribute to full development and equitable resolution of the factual issues.

OAC 4901-1-11 (B) also provides for the following factors to be considered:

(1) The nature of the person's interest; (2) The extent to which the person's interest is represented by existing parties; (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

As noted above, Stand Energy is a natural gas marketer on Dominion's system, and serves substantial end-user loads on Dominion's transportation programs. The increased risks, uncertainties, and costs of participating in Dominion's transportation programs will have the effect of discouraging participation in these programs by end-users and suppliers, thereby significantly harming the competitive market. Stand Energy and its customers have substantial interests in this proceeding.

The disposition of these issues without Stand Energy's participation will impair and impede Stand Energy's ability to protect its interests. No other party participating in these proceedings can adequately protect Stand Energy's interests, and accordingly, Stand Energy respectfully asserts that it would be inappropriate to resolve these issues without Stand Energy's participation. Stand Energy's interests and operational experience are substantially and directly related to these issues and the merits of this proceeding. Stand Energy's intervention will contribute to the full and equitable resolution of these matters, and will assist in the expeditious resolution of these issues. Lastly, Stand Energy's intervention will not unduly delay or unjustly prejudice any existing party.

WHEREFORE, Stand Energy Corporation respectfully submits that the Commission should grant its request to intervene.

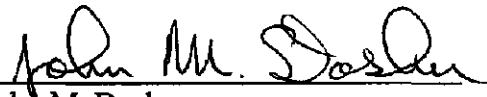
Respectfully submitted,

STAND ENERGY CORPORATION

BY: 
John M. Dosker, Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum in Support of Stand Energy Corporation was served upon the following parties of record via ordinary U.S. Mail postage prepaid on November 20, 2007.


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d/b/a/ Dominion East Ohio**

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