

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Applications 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.)

MOTION TO INTERVENE
OF INTEGRYS ENERGY SERVICES, INC.

Pursuant to Section 4903.221, Revised Code, Rule 4901-01-11 of the Ohio Administrative Code, Integrys Energy Services, Inc. ("Integrys") moves for intervention in these matters. Integrys is an active competitive retail natural gas service ("CRNG") provider certificated by the Commission with offices in Ohio. It provides competitive retail natural gas service to consumers in the Dominion East Ohio service territory. On August 30, 2007, Dominion East Ohio ("DEO") filed applications for an increase in gas distribution rates, for approval of an alternative rate plan, and for approval to change accounting methods. As such, Integrys has a real and substantial interest in these cases and requests that its Motion for Intervention be granted for the reasons set forth below in its accompanying Memorandum in Support.

WHEREFORE, Integrys Energy Services, Inc. respectfully requests that its Motion to Intervene be granted.

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Respectfully submitted,



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MEMORANDUM IN SUPPORT

On August 30, 2007, DEO filed applications for an increase in gas distribution rates, for approval of an alternative rate plan, and for approval to change accounting methods. On September 30, 2007, DEO filed its direct testimony and exhibits. The Commission has approved the proposed newspaper notice for publication and has selected Blue Ridge Consulting Services, Inc. as an independent consultant to assist the staff in the review of the application.

The standards for intervention in proceedings before this Commission are set forth in Section 4903.221, Revised Code, and Rule 4901-1-11 of the Ohio Administrative Code. Section 4903.221, Revised Code, provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

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

Rule 4901-1-11 of the Ohio Administrative Code provides that upon timely motion, any person may be permitted to intervene in a proceeding upon a showing that that person has a real and substantial interest in the proceeding and that in making such an evaluation, the Commission may consider:

- (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 proceedings; and
- (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

Integrus (formerly known as WPS Energy Services, Inc.) is an active competitive retail natural gas provider in the Dominion East Ohio service territory. It has intervened and participated in several cases involving natural gas companies in Ohio. The proposals contained in both the rate increase case and the alternative rate plan will affect the dynamics of competition and customer choices in Dominion East Ohio's service territory. These proposals, if adopted, will have consequences on Integrus's operations and business interests. Therefore, Integrus has a real and substantial interest in these matters.

Integrus is an experienced competitive retail natural gas service provider DEO's system, as well as an experienced operator in several other states. Integrus' experience and knowledge will assist the Commission in considering the issues in these cases, and therefore, Integrus' participation will contribute to the full development and equitable resolution of the issues. No other party can adequately represent Integrus' interests. Integrus' participation will not unduly delay or unjustly prejudice any existing party.

For the above-discussed reasons, Integrus has a direct, real, and substantial interest in the issues in these matters, which can only be protected by its participation.

WHEREFORE, for the reasons explained above, Integrus Energy Services, Inc. respectfully requests that the Commission permit it to intervene in the above-captioned proceedings and be made a party for all purposes.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene was served upon the following persons, by first-class, U.S. mail, postage prepaid, and, where applicable, by e-mail this ____ day of January 7, 2008.

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