

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Approval of)
Tariffs to Recover Through An Automatic)
Adjustment Clause Costs Associated with)
the Establishment of an Infrastructure)
Replacement Program and for Approval of)
Certain Accounting Treatment)

Case No. 07-478-GA-UNC

**MEMORANDUM OF ABC GAS REPAIR, INC. OPPOSING COLUMBIA GAS'
MOTION TO STRIKE**

It should come as no surprise that Columbia wants to limit the record available for the Commission's review, given the overwhelming evidence opposing the proposed IRP and Stipulation. The tact that Columbia takes in that effort, however, is utterly astonishing. Columbia apparently asserts that parties otherwise properly before the Commission lack standing to demonstrate the myriad reasons why a particular proposal is or is not contrary to the public interest. This is a novel approach wholly contrary to both the Commission's longstanding practice and mandate. It also seemingly would set a precedent that Columbia itself would be hard-pressed to follow in future proceedings—let alone its own filings and arguments in this very action.

In any event, ABC Gas Repair, Inc. joins in the memoranda of Interstate Gas Supply, Inc. and Utility Service Partners, Inc. for the reasons stated therein.

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WHEREFORE, for each of the foregoing reasons, ABC Gas Repair, Inc. respectfully requests that the Commission DENY Columbia's Motion to Strike.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Memorandum of ABC Gas Repair, Inc. Opposing Columbia's Motion To Strike was served upon the following persons by electronic mail this 16th day of January, 2008:



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