

**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 for Authority to Increase Rates
for its Gas Distribution Service.**

Case No. 07-829-GA-AIR

**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**

Case No. 07-830-GA-ALT

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

Case No. 07-831-GA-AAM

**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 a
Pipeline Infrastructure Replacement
Program Through an Automatic
Adjustment Clause, And for Certain
Accounting Treatment**

Case No. 08-169-GA-UNC

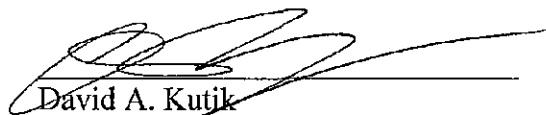
MOTION TO CONSOLIDATE

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, respectfully requests issuance of an Entry consolidating the Company's application in Case No. 08-____-GA-UNC (filed on February 22, 2008 and entitled *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 a Pipeline Infrastructure Replacement Program Through an Automatic Adjustment Clause, And for Certain Accounting Treatment*) ("PIR 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").

DEO filed its Rate Case Application on August 30, 2007, and that Application is currently pending before the Commission. DEO also filed a motion on September 20, 2007, to consolidate the Rate Case Application with the application in Case No. 06-1453-GA-UNC, which pertains to the recovery of costs associated with DEO's deployment of automated meter reading devices ("AMR Application"). Rather than proceed with the PIR Application separately, DEO requests that the Commission consolidate the PIR Application with the Rate Case Application and the AMR 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 22nd day of February, 2008.


Andrew J. Campbell

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

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

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

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

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

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

Industrial Energy Users-Ohio
Samuel C. Randazzo, Esq.
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215

Stand Energy Corporation
John M. Dosker, Esq.
General Counsel
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629

UWUA Local G555
Todd M. Smith, Esq.
Schwarzwald & McNair LLP
616 Penton Media Building
1300 East Ninth Street
Cleveland, Ohio 44114

Integrus Energy Services, Inc.
M. Howard Petricoff
Stephen M. Howard
VORYS, SATER, SEYMOUR AND PEASE
LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008