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BEFORE

2008 FEB 29 PM 4:39 PUBLIC UTILITIES COMMISSION OF OHIO

FILE

PUCO

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.)	

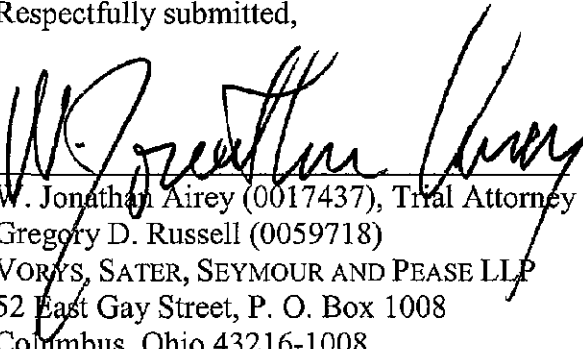
MOTION TO INTERVENE
OF THE OHIO OIL AND GAS ASSOCIATION

Pursuant to Section 4903.221, Revised Code, Rule 4901-01-11 of the Ohio Administrative Code, The Ohio Oil and Gas Association ("the Association") moves for intervention in these matters. The Association is one of the largest state-based oil and natural gas associations in the country and serves to protect its members' interests by participating in federal and state regulatory actions involving the natural gas industry. On August 30, 2007, Dominion East Ohio ("DEO") filed applications for an increase in gas distribution rates, for approval of an alternative rate plan, for approval to change accounting methods, and for changes in its tariff terms and conditions for the delivery of Ohio gas production. As such, the Association 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.

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WHEREFORE, The Ohio Oil and Gas Association respectfully requests that its
Motion to Intervene be granted.

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, for approval to change accounting methods, and for changes in its tariff terms and conditions for the delivery of Ohio gas production. 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.

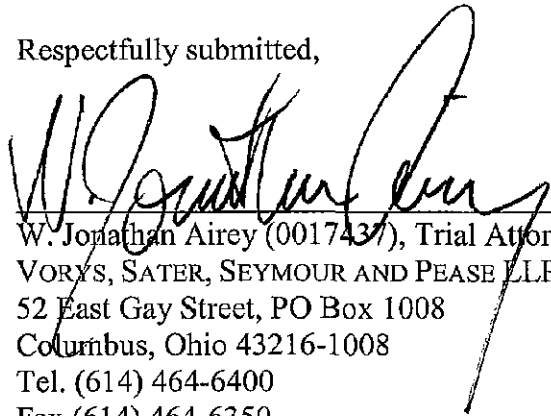
The Association is one of the largest state-based oil and natural gas associations in the country and has served as the representative of Ohio's oil and gas producing industry since 1947. Its 1,300 members are primarily small business entities, similar to small family farms, involved in all aspects of the exploration, development, production and marketing of crude oil and natural gas resources in the State of Ohio. Because of the small size of most Association members, they often rely on OOGA as their primary source of information on industry trends, activities, tax changes, legislation and regulatory matters. The Association also serves to protect its members' interests by participating in federal and state regulatory actions involving the crude oil and natural gas industry.

By way of industry background, Ohio is located in the Appalachian Basin, the most mature producing basin in the country. Nowhere else in North America has commercial oil and gas production existed longer. Its history reaches back to the completion of the first commercial oil well by Colonel Drake in Titusville, Pennsylvania, in 1859. Hundreds of thousands of wells have been drilled and completed in the Appalachian Basin, producing billions of cubic feet (Bcf) of natural gas every year for ultimate consumption by this country's citizens (e.g., Ohio produced over 90 Bcf of natural gas in 2004). Much of this gas is and has been produced in small gas streams from wells that are characterized in the industry as "marginal," where the value of the production barely pays for the continued costs of operation.

For the above-discussed reasons, the Association and its members have 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, The Ohio Oil and Gas Association 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 29th day of February, 2008.

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