



*The*  
**Legal Aid Society**  
*of Cleveland*  
*Since 1905*

FILE

Chief of Docketing  
The Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215-3793

June 20, 2008

PUCO

RECEIVED-DOCKETING DIV  
2008 JUN 23 AM 9:48

SUBJECT: *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 Case East Ohio for Approval of an Alternative Rate Plan for its Gas Distribution Service No. 07-830-GA-ALT*  
*In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Case Ohio for Approval to Change Accounting Methods Case No. 07-831-GA-AAM*

Dear friends:

We are enclosing an Objections to the Staff Report, and a List of the Main Issues, both filed on behalf of our clients, the Citizens Coalition. We have enclosed the requisite number of copies.

Other parties are being served. We have also enclosed an envelope addressed back to us. Please time-stamp one of copy of each filing and return these to us.

Let us know of any problems.

Thank you.

Very truly yours,

  
JOSEPH P. MELISSNER, 0022366  
ATTORNEY AT LAW

[www.lasclev.org](http://www.lasclev.org)

**Main Office**

1223 West Sixth Street  
Cleveland, OH 44113  
Phone: 216.687.1900  
Fax: 216.687.0779

**Ashtabula County**

121 East Walnut Street  
Jefferson, OH 44047  
Phone: 866.873.9665  
Fax: 440.576.3021

**Lake & Geauga**

8 North State St - Ste 300  
Painesville, OH 44077  
Phone: 888.808.2800  
Fax: 440.352.0015

**Lorain County**

538 West Broad St - Ste 300  
Elyria, OH 44035  
Phone: 800.444.7348  
Fax: 440.323.8526

LSCL

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business  
JPM  
Date Processed 6-23-08

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO\**

Original  
RECEIVED-DOCKETING DIV  
2008 JUN 23 AM 9:48  
PUCO  
**FILE**

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  
Through an Automatic Adjustment  
Clause, and for certain Accounting  
Treatment

Case No. 08-169-GA-ALT

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 Automatic Meter  
Reading Deployment Through an  
Automatic Adjustment Clause, and for  
Certain Accounting Treatment

Case No. 06-1453-GA-UNC

---

**LIST OF MAIN ISSUES  
FILED ON BEHALF OF THE  
NEIGHBORHOOD ENVIRONMENTAL COALITION  
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,  
CLEVELAND HOUSING NETWORK  
AND  
THE CONSUMERS FOR FAIR UTILITY RATES**

---

Now comes The Neighborhood Environmental Coalition (hereinafter "Coalition"), The Consumers for Fair Utility Rates (hereinafter "Consumers"), The Cleveland Housing Network (hereinafter "Network"), and The Empowerment Center of Greater Cleveland (hereinafter "Center") who, through their counsel, hereby file Their List of Main Issues in the above-captioned matters pursuant to Ohio Law, The Rules and Regulations pertaining to the Public Utilities Commission of Ohio, the orders of the Hearing Examiners in this case, and the relevant case law. All four of the interveners are hereinafter referred to as "The Citizens Coalition."

Their List of Main Issues are Numbered and Provided below.

1. DSM and Weatherization Programs: While the PUCO Staff and Company have very properly and responsibly proposed and recommended funding for those much needed programs, the amount recommended is far below what is required and would benefit all customers. The amount proposed is \$5.27 million which is a fairly minor increase over the Company's current program. The Citizens Coalition strongly

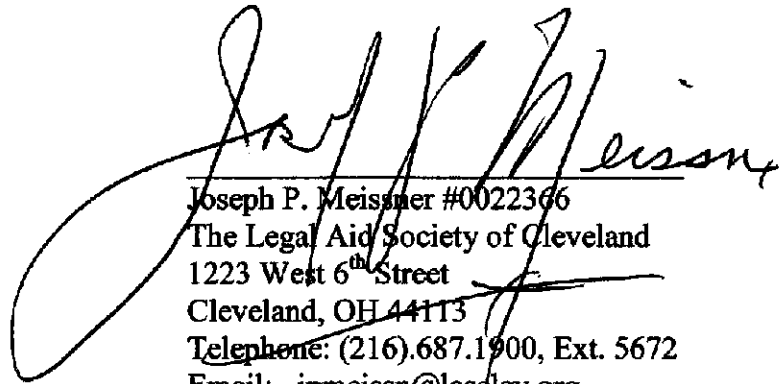
recommends that these programs should be funded at the level of \$25 million a year with \$5 million of this coming from stockholders.

2. Customer Charge: The Staff has proposed a monstrous 300% jump in the customer charge. This will most significantly impact low-income families as well as families who try to conserve. The Citizens Coalition strongly recommends that the entire customer charge should be eliminated.

3. Decoupling: The Staff and Company are proposing a decoupling scheme. This is little more than statistical manipulation and accounting tricks, recalling the machinations of Enron in its utility dealings. No decoupling should be allowed to the Company.

4. Rate of Return: The Staff has proposed a rate of return at the very top of its range of what it considers appropriate. Rather than adopting this inflated figure, a more reasonable rate of return either in the middle or toward the bottom of the Staff's range should be adopted.

Respectfully submitted,

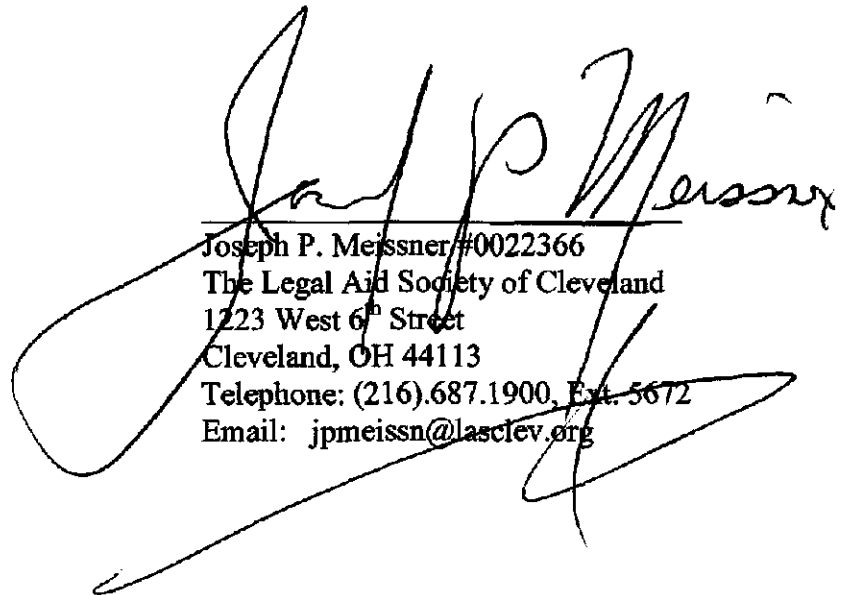


Joseph P. Meissner #0022366  
The Legal Aid Society of Cleveland  
1223 West 6<sup>th</sup> Street  
Cleveland, OH 44113  
Telephone: (216).687.1900, Ext. 5672  
Email: [jpmeissn@lasclev.org](mailto:jpmeissn@lasclev.org)

Counsel for:  
Neighborhood Environmental Coalition,  
Consumers for Fair Utility Rates  
Cleveland Housing Network  
and  
The Empowerment Center of  
Greater Cleveland

**NOTICE OF SERVICE**

I hereby certify that a copy of the foregoing Legal Document was served upon the address of the parties in this PUCO proceeding listed below, and the other parties listed in this case, by ordinary first class mail, postage prepaid, on this 23 day of June 2008.



Joseph P. Meissner #0022366  
The Legal Aid Society of Cleveland  
1223 West 6<sup>th</sup> Street  
Cleveland, OH 44113  
Telephone: (216).687.1900, Ext. 5672  
Email: [jpmessn@lasclev.org](mailto:jpmessn@lasclev.org)

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](mailto: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](mailto: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](mailto:mawhitt@jonesday.com)  
[ajcampbell@jonesday.com](mailto:ajcampbell@jonesday.com)

Jean A. Demarr  
The east Ohio Gas Company d/b/a  
Dominion East Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44101  
Telephone: (216) 736-6334  
Facsimile: (216)736-5308  
[Jean.A.Demarr@dom.com](mailto:Jean.A.Demarr@dom.com)