

FILE

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

PUCO**2011 MAY -2 AM 10:03****RECEIVED-DOCKETING DIV**

Re: In the Matter of the Application of The East Ohio Gas Company d/b/a/ Dominion
 East Ohio for Approval to Modify and Further Accelerate its Pipeline
 Infrastructure Replacement Program and to Recover the Associated Costs; Case
 No. 11-2401-GA-ALT

Dear Docketing Division:

Enclosed for filing in the above-referenced matters is the original and twenty-one (21)
 copies of the Motion To Intervene and Memorandum In Support Of Motion Of Utility Workers
 Union Of American, Local G555. Please file these documents and return one (1) time-stamped
 copy to this office in the enclosed self-addressed, post-paid envelope.

Please contact me if you have any questions regarding thhis filing.

Very truly yours,



Todd M. Smith

Attorney for Utility Workers of America,
 Local G555

GL762.001
 Enclosures

C: Mark A Whitt, with enclosure
 Stephen Reilly, with enclosure
 Colleen L. Mooney, with enclosure

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FILE

RECEIVED-DOCKETING DIV

2011 MAY -2 AM 10: 03

PUCO

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

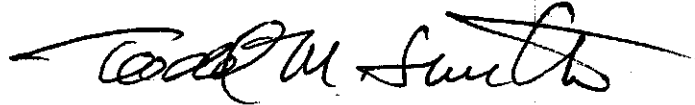
In the Matter of the Application of The East)	
Ohio Gas Company d/b/a/ Dominion East)	Case No. 11-2401-GA-ALT
Ohio for Approval to Modify and Further)	
Accelerate its Pipeline Infrastructure)	
Replacement Program and to Recover the)	
Associated Costs.)	

**MOTION TO INTERVENE
OF UTILITY WORKERS UNION OF AMERICA, LOCAL G-555**

Pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, Utilites Workers Union Of America, Local G-555 ("Local G-555") moves to intervene in the above-captioned proceeding. As set forth in the accompanying Memorandum In Support Of Motion, Local G-555 seeks to intervene in this proceeding because it has a real and substantial interest in the proceeding which will not be adequately protected by the existing parties. Local G-555 accepts the record in this matter as it exists on the date of this filing and is only requesting to participate from this date forward. The participation of Local G-555 in these

proceedings will not cause undue delay or prejudice any existing party. Because Local G-555 satisfies all the factors of the statute and rules, its Motion should be granted.

Respectfully submitted;

A handwritten signature in black ink, appearing to read "Todd M. Smith", written over a horizontal line.

Todd M. Smith
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Counsel for UWUA Local G-555

**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 Approval to Modify and Further)	Case No. 11-2401-GA-ALT
Accelerate its Pipeline Infrastructure)	
Replacement Program and to Recover the)	
Associated Costs.)	

**MEMORANDUM IN SUPPORT OF
MOTION TO INTERVENE
OF UTILITY WORKERS UNION OF AMERICA, LOCAL G-555**

Utilites Workers Union Of America, Local G-555 ("Local G-555") has moved to intervene in the above-captioned proceeding pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. Because Local G-555 satisfies all the factors of the statute and rules, its Motion should be granted.

Local G-555 represents a bargaining unit of approximately twelve hundred (1,200) employees of the East Ohio Gas Company, which does business as Dominion East Ohio ("Dominion"). Bargaining unit members perform a wide range of duties for Dominion including answering telephone inquires regarding billing, service, and emergencies; responding to gas leaks and other hazards; reading meters; turning service on and off; installation, maintenance and repair of gas lines and mains; office clerical duties; warehouse duties; and providing information to contractors regarding location of mains and lines. Its members work and reside in communities throughout northeast Ohio including Ashtabula, Cleveland, Akron, Youngstown, Canton, New Philadelphia, and surrounding areas.

Section 4903.221 of the Ohio Revised Code provides that the Commission should consider the following factors in ruling on a motion to intervene:

- (1) The nature and 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;
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

Section 4909-1-11 of the Ohio Administrative Code includes these factors and adds a fifth factor for consideration of a motion to intervene:

- (5) The extent to which the person's interest is represented by existing parties.

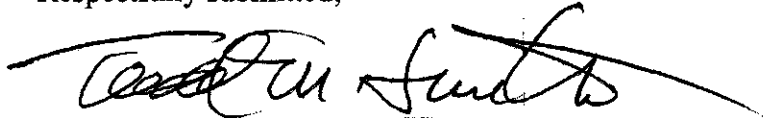
Local G-555 and its members have a broad and unique knowledge of the operation of Dominion, and its interface with the communities it serves. The Local has a deep interest in the safety of the communities in which its members live and work. Local G-555 also has a direct interest in the safety, wages, benefits, working conditions of its members. Finally, the members of Local G-555 are consumers of natural gas like other members of the communities served by Dominion East Ohio. Thus, the interest of Local G-555 in this proceeding is real, direct, substantial, and unique.

Local G-555 and its members seek to ensure that the proceedings initiated by Dominion before the Commission do not adversely affect these substantial and unique interests. The Local will not be able to protect these interests if it is not permitted to intervene. Local G-555 will monitor and review the development of this proceeding before determining the specific positions it will take in this matter.

The participation of Local G-555 in these proceedings will not cause undue delay or prejudice any existing party. The Local accepts the record in this matter as it exists on the date of this filing and is only requesting to participate from this date forward. Its unique knowledge will contribute to the just and expeditious resolution of these proceedings. Its unique interests are not represented by any party to this proceeding.

Accordingly, for the reasons set forth above, Local G-555 should be permitted to intervene and fully participate in this proceeding.

Respectfully submitted;

A handwritten signature in black ink, appearing to read "Todd M. Smith", written over a horizontal line.

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Counsel for Utility Workers Union Of America,
Local G-555


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion To Intervene of Utility Workers Union Of America, Local G-555 and Memorandum In Support Of Motion, were served by First Class U.S. Mail on this 29th day of April, 2011, to the following:

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