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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO MAY 25 AM 9:31

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.)

PUCO

Case No. 11-2401-GA-ALT

**MOTION TO INTERVENE ON BEHALF OF THE
NEIGHBORHOOD ENVIRONMENTAL COALITION
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,
AND
THE CONSUMERS FOR FAIR UTILITY RATES
AND MEMORANDUM IN SUPPORT**

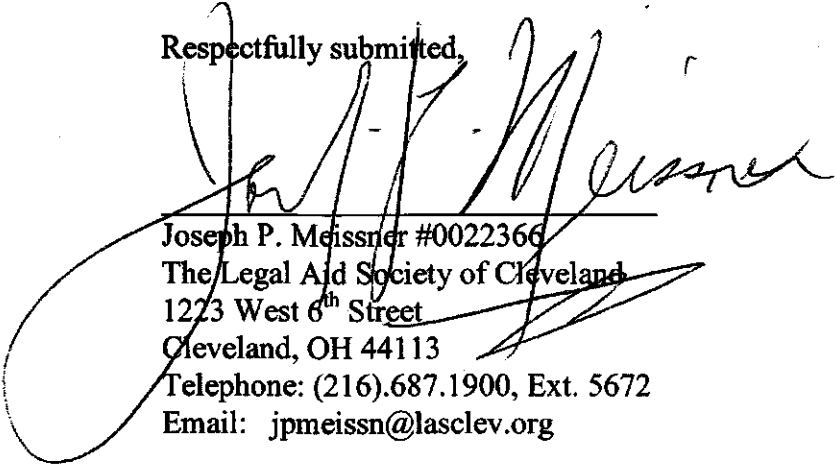
Now comes The Neighborhood Environmental Coalition (hereinafter
"Coalition"), The Consumers for Fair Utility Rates (hereinafter "Consumers"), and The
Empowerment Center of Greater Cleveland (hereinafter "Center") who, through their
counsel, hereby Move to Intervene in the above-captioned matters pursuant to Ohio Law,
The Rules and Regulations pertaining to the Public Utilities Commission of Ohio, and the
relevant case law. All three of the interveners are hereinafter referred to as "The
Citizens Coalition."

The Citizens Coalition specifically seeks the full powers and rights granted by
the Commission specifically, by statute and by the provisions of the Ohio Administrative
Code to intervening parties.

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The reasons for granting this Motion are contained in the Memorandum in
Support attached hereto and hereby incorporated herein.

Respectfully submitted,



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

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

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

**MEMORANDUM IN SUPPORT OF
MOTION TO INTERVENE FILED ON BEHALF OF THE
NEIGHBORHOOD ENVIRONMENTAL COALITION
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,
AND
THE CONSUMERS FOR FAIR UTILITY RATES**

The Neighborhood Environmental Coalition, Consumers for Fair Utility Rates and, THE Empowerment Center of Greater Cleveland, hereinafter the Citizens Coalition, should be permitted to intervene in this matter pursuant to CivR.24 and Rule 4901-1-11 OHIO ADMINISTRATIVE CODE. All three groups specifically meet the criteria for intervention pursuant to OAC 4901-1-11(A)(2) and (B), as well as other relevant Ohio law.

In support of their Motion to Intervene, the Citizens Coalition note that they are citizens groups and agencies whose members, clients, and supporters are seriously affected by any PUCO's decision that could result in raising their rates including for any changes in DEO's Pipeline Infrastructure Replacement (PIR) Program. Given the gravity of the current economic situation of the Greater Cleveland area, the worsening of the economy and employment in our general area, the ongoing housing crisis with increasing numbers of foreclosures, the immense increases in basic necessities including food, energy, and gasoline, and the adverse consequences any increases in gas could have on poor as well as moderate income families, it is incumbent upon the PUCO to grant all three parties intervention in this matter.

Our understanding is that the DEO is seeking significant changes in its PIR. These could lead to increases in our rates whether by a rider or other means on our bills. There is no need for these changes, or at least DEO has failed to prove there is such a need.

Any such increases in our rates are especially burdensome to the customers represented by the Citizens Coalition who are low-income families. Many live on fixed and low incomes. Many of their incomes are declining because of the loss of employment. Any increases in gas rates --coming at this time of what even President Barack Obama has characterized as the worst recession since the Great Depression--will hurt the customers, especially low and moderate income families.

Thus the Citizens Coalition and the low-income families represented by the Coalition have "a real and substantial interest" in the outcome of this current case, as required by OAC 4901-1-11(A). Disposition of this case without permitting the Citizens Coalition to intervene will impair and impede their ability to protect the interests of this particular group of customers. While other parties to this proceeding may also be concerned about the issues that affect low-income families, they have other sets of customers groups which they also must represent, which may impact their legal assistance to low-income families.

The following provides some background on the groups within the Citizens Coalition and how they bring special and particular perspectives to these proceedings which can be helpful in the PUCO's resolution of the issues.

The Neighborhood Environmental Coalition's distinguished history of serving low-income families warrants its involvement in this case. Coalition has been in existence for over thirty years, working especially in neighborhoods surrounding the industrial valley of Cuyahoga County. It is dedicated "to protecting the created environment." It is committed to helping low income families meet their energy and heating needs in ways that will not harm the environment, nor raise the utility rates of needy families. Any Rider or increase in a rider concerns the Coalition because of possible effects upon the budgets of low-income families.

The Coalition and other two interveners are concerned with the proposals of the company which could lead to more horrendous rate increases for customers, both in the near future and more distant future. The Coalition believes that the commission should take actions that are in the best interest of the citizens of Ohio and in order to do so it should avail itself of information and input from as many sources as possible, including from these interveners.

In reaching any decision regarding significant PIR changes and a justification for how this may increase rates the commission should have the most accurate information available to it and it should be presented in the clearest possible manner to the reviewers. The impact of the results of the commission's decisions upon all customers and especially the low and moderate income customers of the company is very significant.

Consumers for Fair Utility Rates, whose predecessor was Low Income People Together, has also been involved in PUCO proceedings for many years. It also has specific concerns about the Company's request in this case.

The Empowerment Center is comprised of low-income families who have intervened in matters before the PUCO since 1971. The Center has a history of contributing beneficially to decisions and outcomes that have been rendered by the PUCO. The Center is quite concerned

about the present plight of low-income families who are burdened with already high gas rates, which will only be worsened by this PIR request. The Center urges the PUCO to reduce the current gas rates, rather than raise them

The foremost reason that has motivated Coalition, Consumers, and Center to seek intervention in this matter is their commitment to helping low and moderate income families. These groups are the only parties in this matter that are exclusively devoted to representing the low income segment of the population

These groups must be heard in this matter in order to protect the interests of low income families and individuals. They have real and substantial interests in this proceeding by virtue of the direct impact changes in gas rates and thus rates determined through this case will have on their members, their supporters, and clients located in the service territories of the relevant utility company. Further, all three of these groups have appeared in past PUCO cases and they have been recognized by the Commission in the past as advocates for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this case. Citizens Coalition also points out that the precedents set in this case will affect consumers, including low-income families, for the next ten to twenty years. This is the time when these and other consumer groups should especially be welcomed by the PUCO to insure that proper, reasonable, fair, and just precedents are established.

The Citizens Coalition will not unduly prolong nor delay the proceedings. In fact, these groups in the past have worked cooperatively with utility companies and other parties in cases on efforts to resolve issues expeditiously

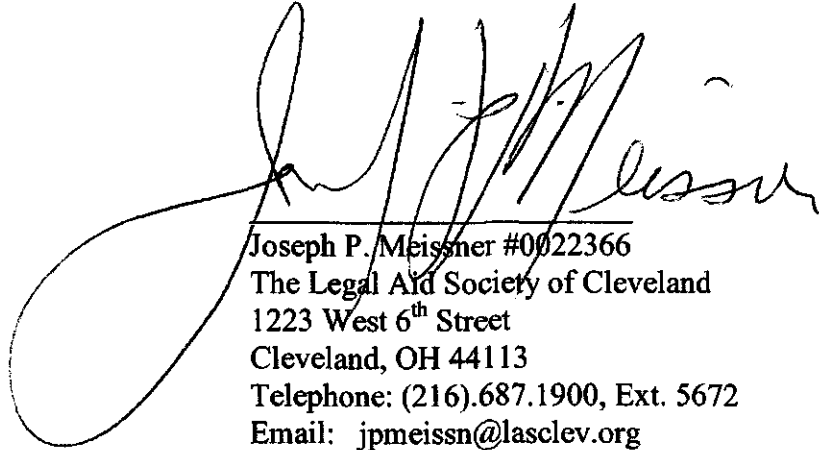
For the above reasons, these interveners have a direct, real and substantial interest in this proceeding.

The rules of the Ohio Administrative Code were established to provide the commission with best information needed to make decisions which are in the best interest of the citizens of Ohio. The Citizens Coalition will provide the best information they can in order to help the PUCO.

These groups will follow all the administrative rulings in this proceeding and their intervention along with any litigation that is required will not unreasonably delay these proceedings.

Wherefore, these groups should be recognized as parties in this case.

Respectfully submitted,

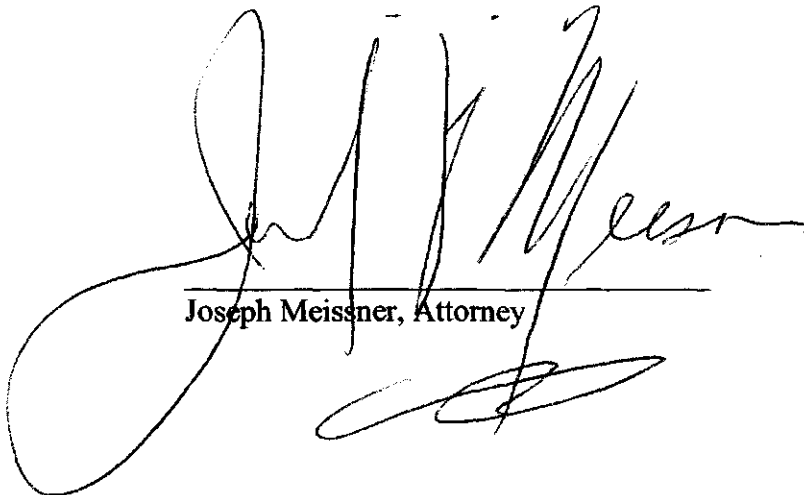


Joseph P. Meissner #0022366
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, OH 44113
Telephone: (216).687.1900, Ext. 5672
Email: jpmeissn@lasclev.org

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene, Memorandum in Support, and Certificate of Service were served by email, upon the parties of record identified below on this 24 May 2011.



Joseph Meissner, Attorney