

In the Matter of the Application of)
The East Ohio Gas Company d/b/a Dominion)
East Ohio for Approval of an Alternative) Case No. 15-0362-GA-ALT
Form of Regulation)

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Attorneys for Industrial Energy Users-Ohio

**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 of an Alternative)	Case No. 15-0362-GA-ALT
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MOTION TO INTERVENE OF INDUSTRIAL ENERGY USERS-OHIO

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter(s) with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On March 31, 2015, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO" or the "Company") filed an application for an alternative rate plan in the above captioned matter.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as

such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Frank P. Darr

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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, Industrial Energy Users-Ohio ("IEU-Ohio") states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of natural gas and related transportation and delivery services.

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices.

On February 22, 2008, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") filed an Application for approval of tariffs to recover, through an automatic adjustment mechanism, costs associated with a 25-year Pipeline Infrastructure Replacement ("PIR") program, assumption of responsibility for ownership of curb-to-meter service lines, and the accounting authority that may be required to permit the deferral of those costs for subsequent recovery through the automatic adjustment mechanism in Case No. 08-169-GA-UNC (hereinafter, "PIR Application"). The Commission consolidated the PIR Application with Case No. 07-829-GA-AIR and

approved DEO's use of a mechanism to recover costs associated with the PIR program. The Commission then modified the mechanism in Case No. 11-2401-GA-ALT. On March 31, 2015, DEO filed the application that initiated this case.

The application in this case seeks to extend the PIR program and mechanism through December 31, 2021 and increase the level of program investment to \$200 million by 2019 with 3% increases in the investment level thereafter for the balance of the term of the program. According to DEO, the increase in investment is required because DEO has identified additional pipe that should be replaced, will incur labor cost increases, has had delays caused by local governments, faces increased environmental compliance costs, and will incur higher costs due to inflation. The rider costs would continue to be offset by operation and maintenance savings through a formula that shares O&M savings. The amount of increase in rates applicable to general service and energy choice transportation customers would continue to be capped, but the caps would increase.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of gas service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the gas supply and related services within Ohio.

Further, IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding because it has intervened and is familiar with the proceedings that preceded this application.

Moreover, the interests of IEU-Ohio will not be adequately represented by other parties to the proceeding.

Accordingly, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Frank P. Darr

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio*, was served upon the following parties of record this 16th day of April, 2015, via electronic transmission.

/s/ Frank P. Darr

Frank P. Darr

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**On Behalf of The East Ohio Gas
Company d/b/a/ Dominion East Ohio**

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Case No(s). 15-0362-GA-ALT

Summary: Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio
electronically filed by Mr. Frank P Darr on behalf of Industrial Energy Users-Ohio