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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Northeast Ohio Natural Gas Corp. to) Case No. 97-1724-GA-AIR
Increase Rates of Its Natural Gas)
Service Area and Related Matters.)

MOTION OF
INDUSTRIAL ENERGY USERS-OHIO
TO INTERVENE AND MEMORANDUM IN SUPPORT

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January 26, 1998

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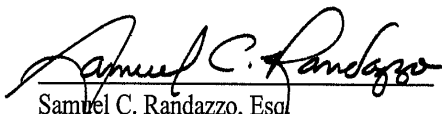
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MOTION TO INTERVENE

The Industrial Energy Users-Ohio ("IEU-OH") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, for leave to intervene in the above-captioned matter with the full powers and rights granted by statute and/or by the provisions of the Commission's Code of Rules and Regulations, to intervening parties. The reasons supporting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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Northeast Ohio Natural Gas Corp. to) Case No. 97-1724-GA-AIR
Increase Rates of Its Natural Gas)
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MEMORANDUM IN SUPPORT
OF MOTION TO INTERVENE

On December 30, 1997, the Northeast Ohio Natural Gas Corporation ("Northeast") docketed a Notice of Intent to Increase Rates of Its Natural Gas Service Area and Related Matters, with the Public Utilities Commission of Ohio ("Commission"), Commission Case No. 97-1724-GA-AIR. Northeast proposes to raise all of its customer rates, in some cases by more than One Hundred Percent (100%).

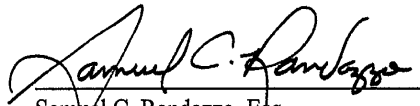
Members of IEU-OH currently receive service from Northeast. In this proceeding, the Commission will hold hearings to determine whether Northeast's current and proposed rate increases, including the transportation charges are just and reasonable. As such, IEU-OH members will be affected directly by the outcome of this proceeding.

IEU-OH submits that its intervention in this matter will not unduly delay nor prolong this proceeding and that IEU-OH will contribute to the full development and equitable resolution of the factual and legal issues raised by this matter. The interest of IEU-OH will not be adequately represented by other parties to the proceeding and, as such, IEU-OH is entitled to

intervene in this proceeding with the full powers and rights granted by statute and / or by the provisions of the Commission's Code of Rules and Regulations, to intervening parties.

For the reasons set forth above, IEU-OH requests that the Commission grant its Motion to Intervene.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Samuel C. Randazzo", is written over a horizontal line.

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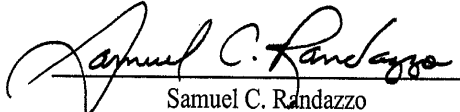
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Intervene was served upon the following parties of record this 26th day of January, 1998, via electronic transmission, hand-delivery or ordinary U.S. mail, postage prepaid.


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