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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion East Ohio)
for Approval of a General Exemption of Certain)
Natural Gas Commodity Sales Services or)
Ancillary Services from Chapters 4905, 4909,)
4935 Except Sections 4905.10, 4935.01, and)
4935.03, and from Specified Sections of)
Chapter 4933 of the Revised Code.)

Case No. 07-1224-GA-EXM

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

Samuel C. Randazzo, Trial Attorney
Daniel J. Neilsen
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
sam@mwncmh.com
dneilsen@mwncmh.com

January 8, 2008

Attorneys for Industrial Energy Users-Ohio

(C24785:)

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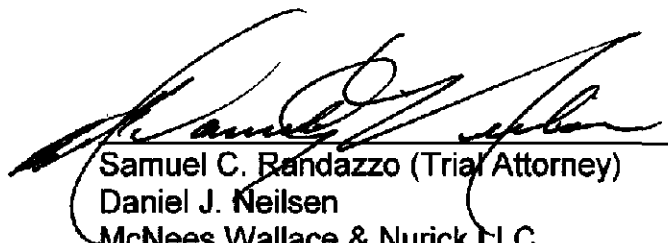
**MOTION TO INTERVENE
OF INDUSTRIAL ENERGY USERS-OHIO**

The 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 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 December 28, 2007, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") filed an Application for approval of Phase II of its plan to exit the merchant function by holding auctions for standard service offer ("SSO") and standard choice offer ("SCO") commodity sales service. 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 these proceedings and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in these proceedings. The interests of IEU-Ohio will not be adequately represented by other parties to the proceedings 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,

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

Samuel C. Randazzo (Trial Attorney)

Daniel J. Neilsen

McNees Wallace & Nurick LLC

Fifth Third Center

21 East State Street, 17TH Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

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MEMORANDUM IN SUPPORT

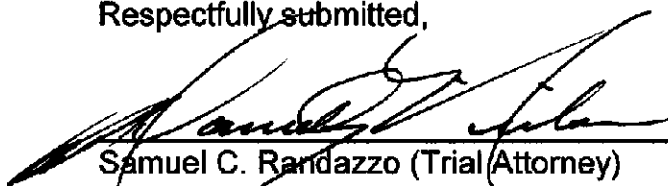
In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/public/about_ieu-ohio/members. IEU-Ohio's members purchase natural gas services from DEO, which is a public utility subject to the jurisdiction of the Commission.

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. Many of IEU-Ohio's member companies are served by DEO and may be affected by the proposed service restructuring that DEO seeks to impose. DEO seeks authority in this proceeding to implement Phase II of its plan to exit the merchant function which, among other things, may result in increases to the rates charged to IEU-Ohio members for natural gas service as well as the quality of the service that IEU-Ohio members receive from DEO. This potential vests IEU-Ohio with a direct, real, and substantial interest in the issues and matters involved in the above-

captioned proceeding, the disposition of which may impair or impede its ability to protect that interest.

For the aforementioned reasons, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding that will only be protected by its participation in this proceeding. Therefore, IEU-Ohio hereby requests that the Commission grant its intervention¹ 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,



Samuel C. Randazzo (Trial Attorney)

Daniel J. Neilsen

MCNEES WALLACE & NURICK LLC

Fifth Third Center

21 East State Street, 17th Floor

Columbus, OH 43215-4228

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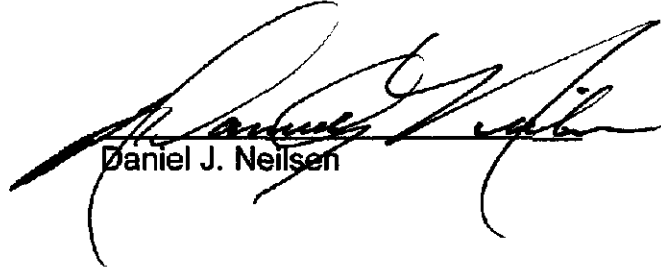
January 8, 2008

Attorneys for Industrial Energy Users-Ohio

¹ The Commission previously granted IEU-Ohio's Motion to Intervene in the Phase I proceeding. *In the Matter of the Application of The East Ohio Gas Company d/b/a/ Dominion East Ohio for Approval of a Plan to Restructure its Commodity Service Function*, Case No. 05-474-GA-UNC, Entry at 5-6 (August 3, 2005).

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene of Industrial Energy Users-Ohio* and *Memorandum in Support* were served upon the following parties of record this 8th day of January 2008, via first class mail, postage prepaid.



Daniel J. Neilsen

Mark A. Whitt
Andrew J. Campbell
JONES DAY
P.O. Box 165017
Columbus, OH 43216-5017

Jean A. Demarr
The East Ohio Gas Company
d/b/a/ Dominion East Ohio
1201 East 55th Street
Cleveland, Ohio 44101

**Counsel for the East Ohio Gas Company
d/b/a Dominion East Ohio**

David C. Rinebolt
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
P.O. Box 1793
Findlay, Ohio 45839-1793

Counsel for Ohio Partners for Affordable Energy