BOEHM, KURTZ & LOWRY

FILE

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Via Overnight Mail

February 15, 2008

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Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case Nos. 08-0072-GA-AIR, 08-0073-GA-ALT, 08-0074-GA-AAM and 08-0075-GA-AAM

Dear Sir/Madam:

Please find enclosed an original and twelve (12) copies of the OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

DFBkew Encl.

Cc: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by ordinary mail, unless otherwise noted, this 15th day of February, 2008 to the following:

Columbia Gas Of Ohio, Inc Robert G. Kriner 200 Civic Center Drive Columbus Oh 43215 Seiple, Stephen
Columbia Gas Of Ohio Inc
200 Civic Center Drive P.O. Box 117
Columbus Oh 43216-0117

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Authority To Amend Filed Tariffs To

Increase The Rates And Charged For Gas Distribution

Service.

Case No. 08-0072-GA-AIR

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In The Matter Of The Application Of Columbia Gas Of

Ohio, Inc. For Approval Of An Alternative Form Of Regulation And For A Change In Its Rates And Charges

In The Matter Of The Application Of Columbia Gas Of

Ohio, Inc. For Approval To Change Accounting Methods

In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Authority To Revise Its Depreciation

Accrual Rates

Case No. 08-0073-GA-ALT

Case No. 08-0074-GA-AAM

Case No. 08-0075-GA-AAM

THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

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COUNSEL FOR OHIO ENERGY GROUP

February 15, 2008

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

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In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Authority To Amend Filed Tariffs To Increase The Rates And Charged For Gas Distribution Service.

Case No. 08-0072-GA-AIR

In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Approval Of An Alternative Form Of Regulation And For A Change In Its Rates And Charges

Case No. 08-0073-GA-ALT

In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Approval To Change Accounting Methods

Case No. 08-0074-GA-AAM

In The Matter Of The Application Of Columbia Gas Of Ohio, Inc. For Authority To Revise Its Depreciation Accrual Rates

Case No. 08-0075-GA-AAM

MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant the Ohio Energy Group ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Republic Engineered Products, Inc., Griffin Wheel Company, Brush Wellman, Inc., AK Steel Corporation, Sunoco, Wheeling-Pittsburgh Steel Corporation, PPG Industries, Inc., Ford Motor Company and Chrysler LLC. These companies use large quantities of natural gas in the manufacture of their products and transport this gas through Columbia Gas. Therefore, the interests of OEG's members may be

indirectly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

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February 15, 2008