

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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PUCO

In the Matter of the Application of The)
East Ohio Gas Company d/b/a Dominion)
East Ohio for Authority to Increase Rates) Case No. 07-829-GA-AIR
for its Gas Distribution Service.)

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. 07-830-GA-ALT
Rate Plan for its Gas Distribution Service.)

In the Matter of the Application of The)
East Ohio Gas Company d/b/a Dominion) Case No. 07-831-GA-AAM
East Ohio for Approval to Change)
Accounting Methods.)

In the Matter of the Application of The)
East Ohio Gas Company d/b/a Dominion)
East Ohio for Approval of Tariffs to) Case No. 08-169-GA-UNC
Recover Certain Costs Associated with a)
Pipeline Infrastructure Replacement)
Program Through an Automatic)
Adjustment Clause, and for Certain)
Accounting Treatment.)

**MOTION
FOR EXTENSION OF TIME TO FILE A MEMORANDUM CONTRA
DOMINION EAST OHIO'S MOTION TO CONSOLIDATE
AND
REQUEST FOR EXPEDITED RULING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13, the Office of the Ohio
Consumers' Counsel ("OCC") moves the Public Utilities Commission of Ohio ("PUCO"
or "Commission") for a three-day extension of the time for the OCC to file a

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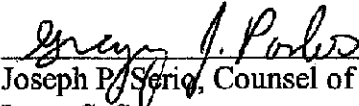
Memorandum Contra the Motion to Consolidate filed by the East Ohio Gas Company d/b/a Dominion East Ohio on February 22, 2008. If the OCC's motion is granted, OCC's Memorandum Contra will be due Friday, March 14, 2008, instead of Tuesday, March 11, 2008.

OCC requests an expedited ruling on this motion, pursuant to Ohio Adm. Code 4901-1-12(C). Pursuant to that rule, the Commission may rule upon requests for extensions of five days or less, without waiting for parties to file responsive memoranda.

OCC's motion and request should be granted for good cause, for the reasons explained in the following memorandum.

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER
CONSUMERS' COUNSEL



Joseph P. Serio, Counsel of Record
Larry S. Sauer
Gregory J. Poulos
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
614-466-8574 (Telephone)
serio@occ.state.oh.us
sauer@occ.state.oh.us
poulos@occ.state.oh.us

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
East Ohio Gas Company d/b/a Dominion)	
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East Ohio for Approval to Change)	
Accounting Methods.)	

In the Matter of the Application of The)	
East Ohio Gas Company d/b/a Dominion)	
East Ohio for Approval of Tariffs to)	Case No. 08-169-GA-UNC
Recover Certain Costs Associated with a)	
Pipeline Infrastructure Replacement)	
Program Through an Automatic)	
Adjustment Clause, and for Certain)	
Accounting Treatment.)	

MEMORANDUM IN SUPPORT

The Commission has before it a Motion to Consolidate filed by the East Ohio Gas Company d/b/a Dominion East Ohio's ("DEO" or "Company"). DEO seeks to consolidate the Company's February 22, 2008 Application in Case No. 08-169-GA-UNC, "In the Matter of the Application of the East Ohio Gas Company, d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with a Pipeline Infrastructure Replacement Program Through an Automatic Adjustment Clause, and for

Certain Accounting Treatment” with the Company’s August 30, 2007 Application to increase rates, for approval of an alternative rate plan, and for approval of a change in accounting methods filed in Case Nos. 07-829-GA-AIR, 07-830-GA-ALT and 07-831-GA-AAM. (“Motion to Consolidate”). In accordance with Ohio Adm. Code 4901-1-12, OCC’s Memorandum Contra DEO’s Motion to Consolidate is currently due on Tuesday, March 11. OCC is asking for an extension of the Memorandum Contra due date of three days, until Friday March 14.

OCC’s personnel material to the drafting and review of OCC’s Memorandum Contra have been significantly detained by their involvement in the Duke Energy rate case that proceeded to hearing last week, among other things. Given these circumstances and the magnitude of the Company’s request to consolidate (\$2.5 billion – in 2007 dollars – over 25 years), OCC requests a minimal extension of three days for the filing date of a Memorandum Contra, until March 14, 2008. Ohio Adm. Code 4901-1-13(A) provides for extensions upon a showing of good cause, and the circumstances of this motion show good cause.

Given the impending due dates for OCC’s Memorandum Contra, OCC requests an expedited ruling on this motion, pursuant to Ohio Adm. Code 4901-1-12(C). Under that Rule, a ruling on OCC’s motion for an extension of three days can be granted without the PUCO waiting for the filing of responsive memoranda (where the extension would be for five days or less). **While the part of Ohio Adm. Code 4901-1-12(C) pursuant to which OCC has filed this Motion does not require that OCC contact the parties,** OCC did call each of the parties as a courtesy for the purpose of advising that

OCC would be filing this motion¹ -- and OCC will serve this Motion by email in addition to regular mail. OCC appreciates the PUCO's consideration of this matter.

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER
CONSUMERS' COUNSEL




Joseph A. Serio, Counsel of Record
Larry S. Sauer
Gregory J. Poulos
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
614-466-8574 (Telephone)
serio@occ.state.oh.us
sauer@occ.state.oh.us
poulos@occ.state.oh.us

¹ Incidentally, out of the thirteen parties on the service list, OCC was able to reach ten, and all ten, including the attorneys for the Company and the Staff agreed to the extension.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time to File A Memorandum Contra was served by first class United States Mail, postage prepaid, and electronic mail to the persons listed below, on this 10th day of March 2008.


Gregory J. Poulos
Assistant Consumers' Counsel

Stephen Reilly
Anne Hammerstein
Attorney General's Office
Public Utilities Section
180 East Broad Street, 9th Floor
Columbus, Ohio 43215

Mark A. Whitt
Andrew J. Campbell
Jones Day
P.O. Box 165017
Columbus, Ohio 43216-5017

Joseph P. Meissner
Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, Ohio 44113

John W. Bentine
Mark S. Yurick
Chester, Willcox & Saxbe LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215-4213

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, Ohio 43215-3900

Joseph M. Clark
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street, Suite 1700
Columbus, Ohio 43215

David A. Kutik
Jones Day
North Point, 901 Lakeside Ave.
Cleveland, Ohio 44114-1190

David Rinebolt
Ohio Partners for Affordable Energy
231 West Lime Street
P.O. Box 1793
Findlay, Ohio 45839-1793

John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629

Stephen M. Howard
Ohio Gas Marketers Group
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008

Todd M. Smith
Schwarzwald & McNair LLP
616 Penton Media Building
1300 East Ninth Street
Cleveland, Ohio 44114

W. Jonathan Airey
Gregory D. Russell
Ohio Oil & Gas Association
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008

David F. Boehm
Michael L. Kurtz
Ohio Energy Group
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202