

**FILE**

**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 Authority to Increase Rates  
for its Gas Distribution Service.**

**Case No. 07-829-GA-AIR**

**In the Matter of the Application of The  
East Ohio Gas Company d/b/a Dominion  
East Ohio for Approval of an Alternative  
Rate Plan for its Gas Distribution Service**

**Case No. 07-830-GA-ALT**

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

**Case No. 07-831-GA-AAM**

**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**

**Case No. 08-169-GA-ALT**

**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  
Automated Meter Reading Deployment  
Through an Automatic Adjustment Clause,  
and for Certain Accounting Treatment**

**Case No. 06-1453-GA-UNC**

**PUCO**

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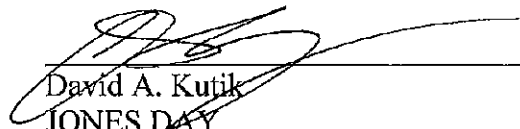
**MEMORANDUM CONTRA THE APPLICATION FOR REHEARING  
BY THE JOINT CONSUMER ADVOCATES  
ON BEHALF OF THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

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The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO" or "Company"), pursuant to Rule 4901-1-35, Ohio Administrative Code, files its Memorandum Contra the Application for Rehearing of July 10, 2008, by the self-styled Joint Consumer Advocates.

Although the Application for Rehearing baldly misstates some of the issues in this case<sup>1</sup> and articulates no legal ground for action, DEO will accept whatever the Commission determines, within its broad discretion, regarding the number and time of hearings and the content and manner of public notices with this caveat: Should the Commission determine that more public hearings are necessary, they should not be scheduled in a way that would delay the resolution of this case. By the time the currently scheduled evidentiary hearings take place, DEO's application will have been on file for nearly a year, and the Commission's proceedings in this matter should be concluded as soon as possible.

Respectfully submitted,



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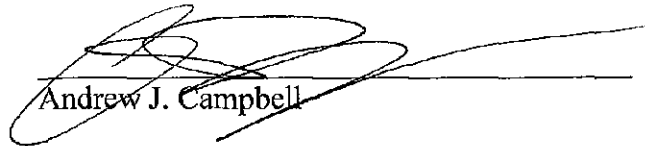
<sup>1</sup> This misstatement primarily occurs in the claim that the legal notice "fails to disclose the amount of revenue increases requested for [the 'accelerated main replacement' and 'advance metering'] programs." (App. for Reh'g at 8.) There is, of course, *no* revenue increase currently requested in either the PIR or AMR cases. Each case only proposes approval of a mechanism, with any cost recovery to be taken up in later proceedings, so there is no revenue increase to disclose.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum Contra the Application for Rehearing by the Joint Consumer Advocates on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio was sent by electronic mail to the following parties on this 14th day of July, 2008.



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