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**FILE**

June 22, 2009

The Public Utilities Commission of Ohio  
Docketing Division  
180 E. Broad St., Columbus, OH 43215  
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RE: 08-1344-GA-EXM

Dear Clerk:

Enclosed please find one original and six copies of Clarification of Filing and Service of Motion to Intervene on Behalf of the Communities in the Northwest Ohio Aggregation Coalition for filing. Please return extra file-stamped copy to my attention in the postage prepaid envelope.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at 419.213.4596.

Sincerely,

*Lance M. Kelffer* <sup>RA</sup>  
Lance M. Kelffer  
Assistant Prosecuting Attorney

LMA/bma

Enclosure

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overnight delivery to the Commission for physical filing on June 5, 2009. A copy of the Internal Memo and UPS Request slip are attached hereto and incorporated herein as Exhibit A.

Through internal error and miscommunication within Lucas County's mail room, the UPS package containing the Motion To Intervene was not sent overnight on Thursday, June 4, 2009, as requested. Instead, the Motion To Intervene was mailed late and did not arrive in Columbus for filing until Tuesday, June 9, 2009. The untimely filing was the fault of Lucas County.

NOAC respectfully requests that its Motion To Intervene be granted. Although officially filed late, it was served on all parties prior to the June 5, 2009 deadline and it was the intention of NOAC to physically complete the filing within the June 5, 2009 deadline. No harm to any other party has occurred due to the late filing, as all parties were timely informed of NOAC's intention to intervene. No opposition to, or motion to strike NOAC's Motion To Intervene has been filed to date. The late filing was a product of error, which NOAC respectfully requests this Commission to overlook in favor of allowing NOAC to participate in this proceeding on behalf of its 80,000 plus natural gas aggregation program participants.

/s/ Leslie Kovacik by consent

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Respectfully submitted,

/s/ Lance M. Keiffer

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/s/ James Moan by consent

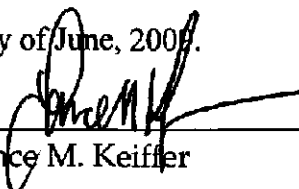
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### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon counsel for the parties of record by either placing a copy in the U.S. Mail or by transmitting a copy electronically to the addresses listed below this 22nd day of June, 2009.

  
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# EXHIBIT A

# MEMO


To: TARA JORDAN

From: BLAIRE ALBRING x4797

Re: UPS MAILING

Date: June 4, 2009

Please send this prepared letter through overnight UPS and bill to the **Commissioners**.  
Thank you!

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2 EXTREMELY URGENT DELIVERY TO	
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8	RECEIVERS / THIRD PARTY'S UPS ACCT. NO. OR MAJOR CREDIT CARD NO.		EXPIRATION DATE
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STREET ADDRESS			
CITY AND STATE			ZIP CODE
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