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June 17, 2010

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Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, Ohio 43215-3793

RECEIVED-DOCKETING DIV  
2010 JUN 18 AM 10:09  
PUCO

Re: 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. 10-0733-GA-RDR

Dear Docketing Division:

Enclosed for filing in the above-referenced matters is the original and fourteen (14) copies of the Motion To Intervene Of Utility Workers Union Of America, Local G-555 And Memorandum In Support Of Motion. Please file these documents and return one (1) time-stamped copy to this office in the enclosure self-addressed and post-paid envelope.

Please contact me if you have any questions regarding thhis filing.

Very truly yours,



Todd M. Smith

Attorney for Utility Workers Union  
of America, Local G-555

GL762.001  
Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
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Docketing Division PUCO  
December 26, 2007  
Page Two

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter Of The Application of The East )  
Ohio Gas Company d/b/a/ Dominion East ) Case No. 10-0733-GA-RDR  
Ohio to Adjust its Pipeline Infrastructure )  
Replacement Program Cost Recovery )  
Charge and Related Mitters )**

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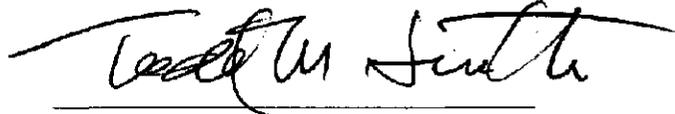
**MOTION TO INTERVENE  
OF UTILITY WORKERS UNION OF AMERICA, LOCAL G-555**

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Pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, Utility Workers Union Of America, Local G-555 ("Local G-555") moves to intervene in the above-captioned proceeding. As set forth in the accompanying Memorandum In Support Of Motion, Local G-555 seeks to intervene in this proceeding because it has a real and substantial interest in the proceeding which will not be adequately protected by the existing parties. Local G-555 accepts the record in this matter as it exists on the date of this filing and is only requesting to participate from this date forward. The participation of Local G-555 in these

proceedings will not cause undue delay or prejudice any existing party. Because Local G-555 satisfies all the factors of the statute and rules, its Motion should be granted.

Respectfully submitted;



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Counsel for UWUA Local G-555

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter Of The Application of The East</b>	)	
<b>Ohio Gas Company d/b/a/ Dominion East</b>	)	<b>Case No. 10-0733-GA-RDR</b>
<b>Ohio to Adjust its Pipeline Infrastructure</b>	)	
<b>Replacement Program Cost Recovery</b>	)	
<b>Charge and Related Mtters</b>	)	

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**MEMORANDUM IN SUPPORT OF  
MOTION TO INTERVENE  
OF UTILITY WORKERS UNION OF AMERICA, LOCAL G-555**

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Utiltites Workers Union Of America, Local G-555 ("Local G-555") has moved to intervene in the above-captioned proceeding pursuant to Section 4903.221 of the Ohio Revised Code and Rule 4901-1-11 of the Ohio Administrative Code. Because Local G-555 satisfies all the factors of the statute and rules, its Motion should be granted.

Local G-555 represents a bargaining unit of approximately twelve hundred (1,200) employees of East Ohio Gas Company, which does business as Dominion East Ohio ("Dominion"). Bargaining unit members perform a wide range of duties for Dominion including answering telephone inquires regarding billing, service, and emergencies; responding to gas leaks and other hazards; reading meters; turning service on and off; installation, maintenance and repair of gas lines and mains; office clerical duties; warehouse duties; and providing information to contractors regarding location of mains and lines. Its members work and reside in communities throughout northeast Ohio including Ashtabula, Cleveland, Akron, Youngstown, Canton, New Philadelphia, and surrounding areas.

Section 4903.221 of the Ohio Revised Code provides that the Commission should consider the following factors in ruling on a motion to intervene:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings;
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

Section 4909-1-11 of the Ohio Administrative Code includes these factors and adds a fifth factor for consideration of a motion to intervene:

- (5) The extent to which the person's interest is represented by existing parties.

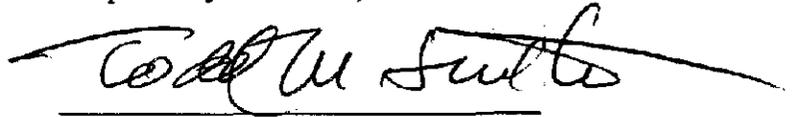
Local G-555 and its members have a broad and unique knowledge of the operation of Dominion, and its interface with the communities it serves. The Local has a deep interest in the safety of the communities in which its members live and work. Local G-555 also has a direct interest in the safety, wages, benefits, working conditions of its members. Finally, the members of Local G-555 are consumers of natural gas like other members of the communities served by Dominion East Ohio. Thus, the interest of Local G-555 in this proceeding is real, direct, substantial, and unique.

Local G-555 and its members seek to ensure that the proceedings initiated by Dominion before the Commission do not adversely affect these substantial and unique interests. The Local will not be able to protect these interests if it is not permitted to intervene. Local G-555 will monitor and review the development of this proceeding before determining the specific positions it will take in this matter.

The participation of Local G-555 in these proceedings will not cause undue delay or prejudice any existing party. The Local accepts the record in this matter as it exists on the date of this filing and is only requesting to participate from this date forward. Its unique knowledge will contribute to the just and expeditious resolution of these proceedings. Its unique interests are not represented by any party to this proceeding.

Accordingly, for the reasons set forth above, Local G-555 should be permitted to intervene and fully participate in this proceeding.

Respectfully submitted;

A handwritten signature in black ink, appearing to read "Todd M. Smith", written over a horizontal line.

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Counsel for Utility Workers Union Of America,  
Local G-555

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion To Intervene of Utility Workers Union Of America, Local G-555 and Memorandum In Support Of Motion, was served by First Class U.S. Mail on this 17<sup>th</sup> day of June, 2010, to the following:

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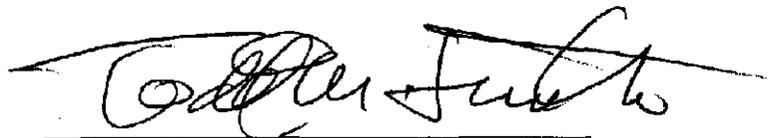
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