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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

WMI GROUP, LLC
P.O. Box 1633
Akron, OH 44309

Complainant,

vs.

DOMINION EAST OHIO
c/o Statutory Agent,
The East Ohio Gas Company
1717 East Ninth Street
Cleveland, OH 44114

Respondent.

CASE NO.:

01-2648-GACSS

COMPLAINT

Complainant, WMI GROUP, LLC., for its Complaint against Respondent,
DOMINION EAST OHIO, states as follows:

1. That WMI Group, LLC (hereinafter referred to as "WMI Group"), is a validly existing limited liability company incorporated under the laws of the State of Ohio.
2. That Respondent, Dominion East Ohio (formerly known as The East Ohio Gas Company) (hereinafter collectively referred to as "Dominion"), is an Ohio foreign

corporation and a public utility as defined by R.C. §4905.02, and is subject to the authority, regulation and jurisdiction of the Public Utilities Commission of Ohio.

3. That WMI Group is a tenant located at 182 Beaver Street, Akron, Ohio.

4. That Dominion provides transport services for the purpose of transporting gas from various gas suppliers to the premises located at 182 Beaver Street, Akron, Ohio.

5. That utilizing the transportation services provided by the Dominion gas lines is the only practical way of obtaining gas to the premises.

6. That WMI Group desires to utilize the transport services offered by Dominion.

7. That on September 6, 2001 and at other times, WMI Group has attempted to make application to Dominion and otherwise obtain transport services for the transportation of gas to the premises leased to WMI Group located at 182 Beaver Street and is ready, willing and able to make payment of the necessary security deposit.

8. That despite repeated attempts to obtain service made by the WMI Group, Dominion has failed and refused to process the application of WMI Group or otherwise permit WMI Group to utilize its transportation services.

9. That said refusal to provide transportation services to the premises leased by WMI Group constitutes malicious, willful and wanton disregard for the rights of WMI Group and is in violation of Dominion's duty to provide such service.

10. That Dominion has deliberately discriminated against WMI Group and otherwise unfairly and wrongfully refused service which has resulted in damages to WMI Group including, but not limited to, loss of business, loss of profits, loss of business opportunity, etc.

WHEREFORE, Complainant, WMI Group respectfully demands that transportation

services be immediately provided to WMI Group and for damages resulting in Dominion's improper, discriminatory, arbitrary and malicious refusal to provide such service.

Respectfully submitted,

BERNLOHR & WEIMER, L.L.P.



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