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May 7, 2009

Hon. Jaclyn A. Brillig

Secretary

New York Public Service Commission

Three Empire State Plaza

Albany, NY 12223-1350

Re: Case 08-G-1392: Proceeding on Rates for St. Lawrence Gas Company, Inc.
Request to Intervene

Dear Secretary Brillig:

Pursuant to Rule 4.3(c) of the New York State Public Service Commission's Rules of Procedure, 16 NYCRR §4.3(c), Power City Partners, L.P. ("Power City") respectfully requests active party status in the above-captioned proceeding. Power City seeks intervention to monitor the proceeding and comment where its interests may be impacted, and agrees to be bound by the record developed to date.

BACKGROUND

On or about November 26, 2008, the St. Lawrence Gas Company, Inc. ("SLG") filed several revised tariff leaves in the above-entitled proceeding which are intended to increase its annual revenue by approximately \$2.167 million.

On February 17, 2009, Judge Phillips issued a Procedural Ruling in this proceeding which, among other things, established the manner in which a party should seek active party status.

DESCRIPTION OF POWER CITY

Power City operates a natural gas fired cogeneration facility on the site of the Alcoa Plant in the Town of Messena, New York. An agreement is currently in force between Power City and SLG which relates to transport services and the possible sale and purchase of surplus gas. Terms of the aforesaid agreement may be influenced by one or more tariff revisions sought by SLG in this proceeding. The parties may also engaged in other tariffed transactions.

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EXHIBIT

Commission Rule 4.3(c) permits intervention if such intervention is likely to contribute to the development of a complete record or is otherwise fair and in the public interest.

As a customer of SLG, Power City has a direct and substantial interest in the outcome of this proceeding that can not be represented adequately by another party. Moreover, Power City's participation is otherwise fair and in the public interest.

Accordingly, Power City respectfully requests that it be permitted intervention in this proceeding with all rights accorded to those with active party status.

COMMUNICATIONS

Power City requests that the following individuals be placed on the active party service list in this proceeding:

Rodger A. Kershner, Esq.

Jon D. Kreucher, Esq.

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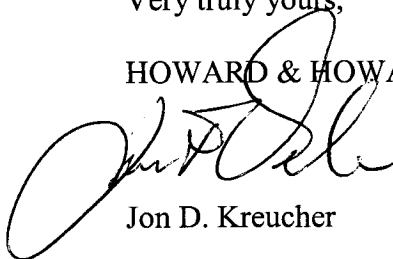
JKreucher@HowardandHoward.com

In accordance with Judge Phillips' February 17, 2009 Procedural Ruling in this matter, a copy of this request for active party status has also been forwarded to Ms. Elizabeth Nicklaus via email.

Thank you for your attention.

Very truly yours,

HOWARD & HOWARD ATTORNEYS PLLC



Jon D. Kreucher

cc: Judge Michele L. Phillips (via e-mail)
Active Party List (via e-mail)
Elizabeth Nicklaus (via e-mail)