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Hearing Date and Time: 3/17/09 at 2:30 p.m.  
Objection Deadline: 3/13/09 at 12:00 p.m.

and

Russell R. Johnson III  
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*Co-Counsel for The Connecticut Light and Power Company,  
PECO Energy Company, The East Ohio Gas Company d/b/a  
Dominion East Ohio, The Cleveland Electric Illuminating  
Company, Ohio Edison Company, Metropolitan Edison Company,  
and Southern Connecticut Gas Company*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** )  
 ) **Chapter 11**  
 )  
**JOURNAL REGISTER COMPANY, et al.,** ) **Case No. 09-10769 (ALG)**  
 )  
 ) **(Jointly Administered)**  
**Debtors.** )  
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**JOINDER OF SOUTHERN CONNECTICUT GAS COMPANY  
TO THE OBJECTION OF CERTAIN UTILITY COMPANIES TO THE  
DEBTORS' MOTION FOR INTERIM AND FINAL ORDERS: (I)  
PROHIBITING UTILITIES FROM ALTERING OR DISCONTINUING SERVICES; (II)  
ESTABLISHING PROCEDURES FOR PROVIDING DEPOSITS TO REQUESTING  
UTILITIES; (III) DEEMING UTILITY COMPANIES TO HAVE ADEQUATE  
ASSURANCE OF PAYMENT; AND (IV) ESTABLISHING PROCEDURES FOR  
RESOLVING REQUESTS FOR ADDITIONAL ASSURANCE OF PAYMENT**

Southern Connecticut Gas Company (“SCG”), by counsel, hereby joins in the *Objection of Certain Utility Companies* (the “Objection”) (Docket No. 89) to the *Debtors’ Motion For Interim and Final Orders: (I) Prohibiting Utilities From Altering or Discontinuing Services; (II) Establishing Procedures For Providing Deposits To Requesting Utilities; (III) Deeming Utility Companies To Have Adequate Assurance of Payment; and (IV) Establishing Procedures For Resolving Requests For Additional Assurance of Payment* (the “Utility Motion”), and set forth the following:

### **Introduction**

1. SCG adopts and incorporates by reference herein the *Introduction* section set forth in the Objection.

### **Facts**

2. SCG adopts and incorporates by reference herein the *Facts* section set forth in the Objection.

### **Facts Concerning the Utilities**

3. SCG adopts and incorporates by reference herein the *Facts Concerning the Utilities* section set forth in the Objection.

4. Additionally, in order to avoid the need to bring witnesses and have lengthy testimony regarding SCG’s regulated billing cycles, SCG requests that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of SCG’s billing cycles. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, SCG is providing the following web site link to its tariffs:

<http://www.dpuc.state.ct.us/DPUCINFO.nsf/2a87d602f30e879485256b430053c129/dbb65812308>

5. Subject to a reservation of rights to supplement its post-petition deposit request if additional accounts belonging to the Debtors are subsequently identified, SCG's prepetition debt estimate and post-petition deposit request is currently as follows:

<u>Utility</u>	<u>No. of Accts.</u>	<u>Est. Pre-Pet. Debt</u>	<u>Dep. Request</u>
SCG	3	n/a	\$36,450 (3-month)

**Discussion**

**A. THE UTILITY MOTION SHOULD BE DENIED AS TO THE UTILITIES.**

SCG incorporates and adopts by reference the legal and factual arguments set forth in the Objection.

**B. THE COURT SHOULD ORDER THE DEBTORS TO PROVIDE THE ADEQUATE ASSURANCE OF PAYMENT REQUESTED BY THE UTILITIES PURSUANT TO SECTION 366 OF THE BANKRUPTCY CODE.**

SCG incorporates and adopts by reference the legal and factual arguments set forth in the Objection.

WHEREFORE, SCG respectfully requests that this Court enter an order:

1. Denying the Utility Motion as to SCG;
2. Awarding SCG post-petition adequate assurance of payment pursuant to Section 366 in the amount satisfactory to SCG; and
3. Providing such other and further relief as the Court deems just and appropriate.

Dated: Garden City, New York  
March 13, 2009

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: /s/ Jil Mazer-Marino  
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Jil Mazer-Marino

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