BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Its Electric Security Plan.  In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Revised Tariffs.  In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Certain Accounting  Authority Pursuant to Ohio Rev. Code  § 4905.13. | )  )  )  )  )  )  )  )  )  )  ) | Case No. 16-0395-EL-SSO  Case No. 16-0396-EL-ATA  Case No. 16-0397-EL-AAM |

**MOTION TO MODIFY PROCEDURAL SCHEDULE AND MEMORANDUM IN SUPPORT**

**OF INTERSTATE GAS SUPPLY, INC.**

Joseph Oliker (0086088)

Email: [joliker@igsenergy.com](mailto:joliker@igsenergy.com)

Counsel of Record

Michael Nugent (0090408)

Email: mnugent@igsenergy.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5000

Facsimile: (614) 659-5073

***Attorneys for IGS Energy***

**January 10, 2019**

BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Its Electric Security Plan.  In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Revised Tariffs.  In the Matter of the Application of The  Dayton Power & Light Company for  Approval of Certain Accounting  Authority Pursuant to Ohio Rev. Code  § 4905.13. | )  )  )  )  )  )  )  )  )  )  ) | Case No. 16-0395-EL-SSO  Case No. 16-0396-EL-ATA  Case No. 16-0397-EL-AAM |

**MOTION TO MODIFY PROCEDURAL SCHEDULE**

On December 6, 2018, the Attorney Examiner authorized a procedural schedule in the above referenced matters. Due to extensions during the holidays granted by Interstate Gas Supply Inc. ("IGS") to The Dayton Power and Light Company ("DP&L") to respond to discovery, pursuant to Ohio Adm. Code 4901-1-12(A), IGS hereby moves to modify the procedural schedule. To ensure that IGS may adequately prepare for trial, IGS proposes that the Commission authorize the following revised procedural schedule:

* IGS testimony: February 12, 2019
* Discovery cut-off (for paper discovery other than notices of depositions): February 19, 2019
* Hearing commences: March 26, 2019

For the reasons set forth in the attached memorandum in support, IGS requests that the Public Utilities Commission of Ohio (“Commission”) grant this motion. DP&L does not oppose this motion.

Respectfully submitted,

*/s/ Joseph Oliker\_\_\_\_\_\_\_\_\_*

Joseph Oliker (0086088)

Email: [joliker@igsenergy.com](mailto:joliker@igsenergy.com)

Counsel of Record

Michael Nugent (0090408)

Email: mnugent@igsenergy.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5000

Facsimile: (614) 659-5073

***Attorneys for IGS Energy***

BEFORE

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**MEMORANDUM IN SUPPORT**

On December 6, 2018, the Attorney Examiner issued an entry establishing a procedural schedule in the above referenced matters. Specifically, the Attorney Examiner set forth the following schedule:

* IGS testimony: January 28, 2019
* Hearing resumes (for one witness): February 1, 2019
* Discovery cut-off (for paper discovery other than notices of depositions): February 4, 2019
* Hearing resumes: February 26, 2019

IGS then served discovery upon DP&L. Subsequently, to accommodate holiday schedules, DP&L requested and received two extensions to respond IGS’ discovery. Due to these delays, IGS moves to modify the procedural schedule. To ensure that IGS may properly prepare for trial, IGS proposes to extend the deadline for discovery and testimony by 15 days. However, given additional conflicts identified in February and March, it is necessary to further extend the date for the hearing in this matter. Accordingly, IGS proposes to set forth the following schedule, which is acceptable to DP&L:

* IGS testimony: February 12, 2019
* Discovery cut-off (for paper discovery other than notices of depositions): February 19, 2019
* Hearing commences: March 26, 2019

This revised schedule will obviate the need to break the trial into two parts, as was the case under the prior schedule.

Therefore, IGS respectfully requests that the Commission grant this motion and modify the procedural schedule for this proceeding.

Respectfully submitted,

*/s/ Joseph Oliker\_\_\_\_\_\_\_\_\_*

Joseph Oliker (0086088)

Email: [joliker@igsenergy.com](mailto:joliker@igsenergy.com)

Counsel of Record

Michael Nugent (0090408)

Email: mnugent@igsenergy.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5000

Facsimile: (614) 659-5073

***Attorneys for IGS Energy***

**CERTIFICATE OF SERVICE**

I certify that this *Motion to Modify Procedural Schedule and Memorandum in Support of Interstate Gas Supply, Inc.* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 10th day of January 2019. The PUCO’s e-filing system will electronically serve notice of the filing of this document on the following parties:

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| cfaruki@ficlaw.com djireland@ficlaw.com jsharkey@ficlaw.com mfleisher@elpc.org fdarr@mwncmh.com mpritchard@mwncmh.com jeffrey.mayes@monitoringanalytics.com evelyn.robinson@pjm.com schmidt@sppgrp.com dboehm@BKLlawfirm.com mkurtz@BKLlawfirm.com kboehm@BKLlawfirm.com jkylercohn@BKLlawfirm.com william.wright@ohioattorneygeneral.gov Michelle.d.grant@dynegy.com rsahli@columbus.rr.com slesser@calfee.com  jlang@calfee.com talexander@calfee.com lhawrot@spilmanlaw.com dwilliamson@spilmanlaw.com charris@spilmanlaw.com gthomas@gtpowergroup.com laurac@chappelleconsulting.net stheodore@epsa.org todonnell@dickinsonwright.com jeanne.kingery@duke-energy.com | kristin.henry@sierraclub.org thomas.mcnamee@ohioattorneygeneral.gov bojko@carpenterlipps.com ghiloni@carpenterlipps.com mjsettineri@vorys.com glpetrucci@vorys.com  [ibatikov@vorys.com](mailto:ibatikov@vorys.com)  wasieck@vorys.com william.michael@occ.ohio.gov mdortch@kravitzllc.com tdougherty@theOEC.org cmooney@ohiopartners.org sechler@carpenterlipps.com gpoulos@enernoc.com elizabeth.watts@duke-energy.com stephen.chriss@walmart.com greg.tillman@walmart.com mwarnock@bricker.com dborchers@bricker.com ejacobs@ablelaw.org tony.mendoza@sierraclub.org [chris@envlaw.com](mailto:chris@envlaw.com)  jdoll@djflawfirm.com  dparram@bricker.com [paul@carpenterlipps.com](mailto:paul@carpenterlipps.com) [dressel@carpenterlipps.com](mailto:dressel@carpenterlipps.com) [rsahli@columbus.rr.com](mailto:rsahli@columbus.rr.com) |

*/s/ Joseph Oliker\_\_\_\_\_\_\_\_\_*

Joseph Oliker