BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of Ohio  Edison Company, The Cleveland Electric  Illuminating Company and The Toledo  Edison Company for Authority to Provide  for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan | )  )  )  )  )  )  ) | Case No. 14-1297-EL-SSO |

**MOTION FOR EXTENSION OF FILING DEADLINE AND MEMORANDUM IN SUPPORT AND REQUEST FOR EXPEDITED TREATMENT OF INTERSTATE GAS SUPPLY, INC.**

Joseph Oliker (0086088)

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***Attorneys for IGS Energy***

**June 15, 2015**

BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of Ohio  Edison Company, The Cleveland Electric  Illuminating Company and The Toledo  Edison Company for Authority to Provide  for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan | )  )  )  )  )  )  ) | Case No. 14-1297-EL-SSO |

**MOTION FOR EXTENSION OF FILING DEADLINE AND REQUEST FOR EXPEDITED TREATMENT**

Pursuant to Rule 4901-1-12, 4901-1-13 and 4901-1-15, Ohio Administrative Code (“OAC”), Interstate Gas Supply, Inc. (“IGS Energy” or “IGS”) hereby moves the Public Utilities Commission of Ohio (“Commission”) to extend the deadline for filing IGS’s reply to the interlocutory appeals submitted by Duke Energy Ohio, Inc. (“Duke”) and Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company’s (collectively “FirstEnergy”) until Wednesday, June 17, 2015. IGS has contacted Duke’s counsel and FirstEnergy’s counsel and they do not oppose the motion.

For the reasons stated in the attached memorandum in support, IGS requests that the Commission grant this motion. IGS requests that the Commission grant this motion on an expedited basis.

Respectfully submitted,

*/s/ Joseph Oliker*

Joseph Oliker (0086088)

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IGS Energy

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***Attorneys for IGS Energy***

BEFORE

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**MEMORANDUM IN SUPPORT**

At a discovery conference on June 2, 2015, the Attorney Examiner denied third party Duke’s motion to quash a subpoena to produce a prior forecast created by witness Judah Rose. Duke and FirstEnergy filed interlocutory appeals on June 8, 2015.

Under Rule 4901-1-15(D), OAC, “[u]nless otherwise ordered by the commission, any party may file a memorandum contra within five days after the filing of an interlocutory appeal.” Thus, IGS’s reply would normally be due on Monday, June 15, 2015. The deadline, however, may be modified by the Commission on its own initiative or in response to a motion of a party. *See* Rule 4901-1-12, OAC; Rule 4901-1-13, OAC; Rule 4901-1-15, OAC.

Due to unanticipated, unavoidable events outside of the control of IGS’s counsel, IGS requests additional time to prepare and file its reply to the interlocutory appeals. Both Duke and FirstEnergy have indicated that they do not oppose extending the filing deadline until Wednesday, June 17, 2015. Because the proposed extension is of limited duration and is otherwise reasonable, the Commission should grant this motion.

Furthermore, because the parties impacted by this motion do not oppose the relief requested herein, there is no need to receive additional pleadings. Thus, the Commission should grant this motion on an expedited basis.

Respectfully submitted,

*/s/ Joseph Oliker*

Joseph Oliker (0086088)

Counsel of Record

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IGS Energy

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***Attorneys for IGS Energy***

**CERTIFICATE OF SERVICE**

I certify that this Motion to Extend Filing Deadline and Memorandum in Support and Request for Expedited Treatment was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 15th day of June, 2015 and electronically served to the following parties:

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| Thomas.mcnamee@puc.state.oh.us Thomas.lindgren@puc.state.oh.us Ryan.orourke@puc.state.oh.us  mkurtz@BKLlawfirm.com kboehm@BKLlawfirm.com jkylercohn@BKLlawfirm.com stnourse@aep.com  [mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)  yalami@aep.com joseph.clark@directenergy.com ghull@eckertseamans.com  myurick@taftlaw.com zkravitz@taftlaw.com [Schmidt@sppgrp.com](mailto:Schmidt@sppgrp.com)  [ricks@ohanet.org](mailto:ricks@ohanet.org)  tobrien@bricker.com  [mkl@bbrslaw.com](mailto:mkl@bbrslaw.com)  gas@bbrslaw.com  [ojk@bbrslaw.com](mailto:ojk@bbrslaw.com)  wttpmlc@aol.com lhawrot@spilmanlaw.com  dwilliamson@spilmanlaw.com blanghenry@city.cleveland.oh.us hmadorsky@city.cleveland.oh.us  kryan@city.cleveland.oh.us jscheaf@mcdonaldhopkins.com gkrassen@bricker.com dstinson@bricker.com  dborchers@bricker.com  drinebolt@ohiopartners.org meissnerjoseph@yahoo.com LeslieKovacik@toledo.oh.gov trhayslaw@gmail.com  Jeffrey.mayes@monitoringanalytics.com mhpetricoff@vorys.com mjsettineri@vorys.com  glpetrucci@vorys.com msoules@earthjustice.org [sfisk@earthjustice.org](mailto:sfisk@earthjustice.org)  Larry.sauer@occ.ohio.gov  Michael.schuler@occ.ohio.gov  Kevin.moore@occ.ohio.gov | burkj@firstenergycorp.com cdunn@firstenergycorp.com [jlang@calfee.com](mailto:jlang@calfee.com)  talexander@calfee.com  dakutik@jonesday.com sam@mwncmh.com  fdarr@mwncmh.com mpritchard@mwncmh.com cmooney@ohiopartners.org  callwein@wamenergylaw.com mswhite@igsenergy.com Bojko@carpenterlipps.com  Allison@carpenterlipps.com hussey@carpenterlipps.com barthroyer@aol.com athompson@taftlaw.com  Christopher.miller@icemiller.com Gregory.dunn@icemiller.com Jeremy.grayem@icemiller.com  blanghenry@city.cleveland.oh.us hmadorsky@city.cleveland.oh.us kryan@city.cleveland.oh.us  [tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  [finnigan@edf.org](mailto:finnigan@edf.org)  Marilyn@wflawfirm.com todonnell@dickinsonwright.com  matt@matthewcoxlaw.com [mfleisher@elpc.org](mailto:mfleisher@elpc.org)  mitch.dutton@fpl.com selisar@mwncmh.com ccunningham@akronohio.gov asonderman@keglerbrown.com  sechler@carpenterlipps.com gpoulos@enernoc.com toddm@wamenergylaw.com amy.spiller@duke-energy.com  Jeanne.kingery@duke-energy.com dwilliamson@spilmanlaw.com lhawrot@spilmanlaw.com |

/s/ Joseph Oliker

Counsel for Interstate Gas Supply, Inc.