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November 25, 2008

MEMORANDUM IN SUPPORT

On December 28, 2007, Columbia Gas of Ohio, Inc. ("Columbia") and other stakeholders, including the Staff of the Public Utilities Commission of Ohio and the Office of the Ohio Consumers' Counsel ("OCC"), filed an Amended Stipulation and Recommendation ("Stipulation") in this docket. On April 9, 2008, the Public Utilities Commission of Ohio ("Commission") issued an Opinion and Order approving the Stipulation with modification. On June 4, 2008, the Commission issued an Entry on Rehearing upholding the April 9, 2008 Opinion and Order as well as the Stipulation. The Stipulation requires Columbia to file a pre-filing notice by November 30, 2008 containing estimated IRP schedules for the IRP Rider to become effective the following May.¹ The estimated schedules will contain a combination of actual and projected data for calendar year 2008. By February 28, 2009, Columbia will file an updated application with schedules supporting the proposed IRP Rider based on the costs accumulated through December 31, 2008.

On March 3, 2008, Columbia filed applications in Case Nos. 08-0072-GA-AIR et al. for an increase in gas distribution rates and for approval of an alternative rate plan, as well as applications for approval of changes in certain accounting issues. On October 24, 2008, Columbia and other stakeholders, including the Commission Staff and the OCC, filed a Joint Stipulation and Recommendation. The Joint Stipulation and Recommendation expanded Columbia's original Rider IRP, and that agreement also includes a requirement that within thirty days of the Commission Order adopting the Joint Stipulation and Recommendation Columbia shall file a pre-filing notice of the expanded IRP Rider that contains estimated schedules for the IRP Rider to become effective the following May 1.² The estimated schedules will also contain a combination of actual and projected data for the calendar year in which the pre-filing notice is filed. By the following February 28 Co-

¹ See Amended Stipulation and Recommendation (Dec. 28, 2007), at 11.

² *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution Services*, Joint Stipulation and Recommendation (Oct. 24, 2008), at 11.

Columbia will file an updated application with schedules supporting the proposed IRP rider based on the costs accumulated through the end of the calendar year ending December 31. If the Commission adopts the Joint Stipulation and Recommendation the Rider IRP filing required by the April 9, 2008 Order in Case No. 07-478-GA-UNC will be subsumed in the Rider IRP process set forth in Case Nos. 08-0072-GA-AIR et al. The Joint Stipulation and Recommendation is under consideration by the Commission, and an order in Case Nos. 08-0072-GA-AIR et al is pending. However, assuming the Commission adopts the Joint Stipulation and Recommendation, Columbia's Rider IRP filing for the Rider IRP rate to become effective in May 2009 will not be due until late 2008 or early 2009, depending on the timing of the Commission's order.

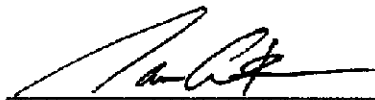
Given the duplicative nature of the IRP Rider pre-filing notices to be filed in the instant docket and Case Number 08-0072-GA-AIR et al, and given the slight mismatch in timing, Columbia hereby requests that the Commission grant Columbia an extension of time to file the IRP pre-filing notice required by the April 9, 2008 Order in Case No. 07-478-GA-UNC until such time that the Rider IRP filing required by Case Nos. 08-0072-GA-AIR et al becomes due. This will permit Columbia to docket a single Rider IRP filing consistent with the Joint Stipulation and Recommendation in Case Numbers 08-0072-GA-AIR et al. Thus, Columbia is proposing to file the pre-filing notice within thirty days after the Commission issues an Opinion and Order in Case Numbers 08-0072-GA-AIR et al. Columbia's obligations to support the pre-filing notice by demonstrating the reasonableness of the level of recovery of its IRP expenditures will not be altered in any fashion should the Commission grant this Motion. As such, no party to this case will experience undue prejudice or harm.

Columbia further requests that the Commission issue an expedited ruling on this motion. Columbia was able to contact most parties of record and has confirmed that no party objects to its

request for an expedited ruling. However, Columbia was unable to contact Vincent A. Parisi or John W. Bentine, both of whom represent Interstate Gas Supply, Inc.

WHEREFORE, for the reasons discussed above Columbia respectfully requests that the Commission issue an expedited ruling granting an extension of time to file the pre-filing notice, as described above.

Respectfully Submitted,
COLUMBIA GAS OF OHIO, INC.



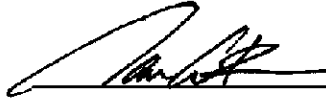
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COLUMBIA GAS OF OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion for Extension of Time and Request for an Expedited Ruling of Columbia Gas of Ohio, Inc. by regular and electronic mail on all parties of record this 25th day of November, 2008.



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