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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

2009 JUL 10 PM 3:18

In the Matter of Protocols for the
Measurement and Verification of Energy
Efficiency and peak Demand Reduction
Measures.

Case No. 09-512-GE-UNC

PUCO

**MOTION FOR EXTENSION AND MEMORANDUM IN SUPPORT OF THE EAST
OHIO GAS COMPANY D/B/A DOMINION EAST OHIO, COLUMBIA GAS OF OHIO,
INC., VECTREN ENERGY DELIVERY OF OHIO, INC., AND DUKE ENERGY OHIO,
INC. (EXPEDITED RULING REQUESTED)**

Pursuant to Rule 4901-1-13, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), Columbia Gas of Ohio, Inc. ("Columbia") Vectren Energy Delivery of Ohio, Inc. ("VEDO"), and Duke Energy Ohio, Inc. ("DE-Ohio") (together the "Gas Utilities") jointly submit this Motion for Extension of Time to extend the procedural schedule in this matter by approximately thirty days. Specifically, the Gas Utilities move that the procedural schedule in this matter be amended as follows:

August 14, 2009	Deadline for filing of comments regarding Appendix B
September 1, 2009	Deadline for filing of comments regarding Appendix A
September 8, 2009	Deadline for filing of lists of proposed measures
October 15, 2009	Deadline for filing of proposed values and protocols

The Gas Utilities also seek expedited treatment of this motion pursuant to Rule 4901-1-12. Because there are not yet any parties of record in this proceeding, no other persons or entities have been contacted pursuant to that Rule. Granting this motion pursuant to expedited

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treatment will not adversely effect any person or entity which may be a stakeholder in the process set forth by the Commission in this matter.

On June 24, 2008, the Commission issued an Entry setting forth a procedural schedule in this matter. The Commission set the procedural schedule, in part, to permit the electric utilities to use the Technical Reference Manual ("TRM") to prepare their January 1, 2010 filings of energy efficiency portfolio plans required pursuant to pending Rule 4901:1-39-04. Entry at 7. There is no similar rule for natural gas utilities. Because the Gas Utilities are not required to develop or implement energy efficiency programs, there is not the same urgency regarding the development of a TRM with respect to gas utilities.

The Gas Utilities intend to develop joint comments regarding Appendix B, Appendix A, proposed measures, and proposed values and protocols. Joint comments will serve the public interest and permit the Commission to consider unified recommendations from the Gas Utilities, rather than piecemeal proposals from separate utilities. The Commission expressed this idea in its Entry when it sought consensus comments from natural gas utilities regarding proposed measures (Entry at 6) and the issues set forth in Paragraph 7 of the Entry (Entry at 6-7). Further, to the extent practicable, the Gas Utilities will consult with mercantile customers and other interested parties in the development of their joint comments.

The Gas Utilities need additional time to prepare joint comments, in part, because their collective experience with energy efficiency programs is largely restricted to lower-income energy efficiency programs. Thus, it will take the Gas Utilities additional time to develop comments to the Commission's proposed measures and protocols, which are not limited to lower-income programs. The Gas Utilities and their customers have, however, been diligent in their efforts to support energy efficiency. For example, in their most recent respective rate cases,

each Gas Utility committed to spend millions of dollars on energy efficiency programs. *See* Entry at 2. The Gas Utilities are also involved in ongoing demand side management collaboratives. Given these efforts and the need to develop measures and protocols unique to gas utilities, it is appropriate that the Commission grant this motion.

The Gas Utilities also seek an expedited ruling so that they may know whether they must file comments on July 15, 2009. An expedited ruling is appropriate because no other stakeholder is affected if the Commission grants the Gas Utilities' motion. All other stakeholders may still file their comments in accord with the Commission's procedural schedule set forth in its June 24, 2009, Entry. The Commission may still issue a framework TRM by November 11, 2009, in time for the electric utilities to use the TRM to prepare their portfolios for filing by January 1, 2010. Further, there are no parties to Case No. 09-512-GE-UNC, as listed in the Commission's DIS system, to contact pursuant to Rule 4901-1-12.

For the reasons stated above, the Gas Utilities respectfully request the Commission provide an expedited ruling and amend the procedural schedule as requested.

Respectfully submitted,



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