

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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2004 JUL -1 PM 4: 20

In the Matter of the Application)
of Interstate Gas Supply, Inc.)
for Certification as a Retail)
Natural Gas Supplier)

Case No. 02-1683-GA-CRS **PUCO**

**INTERSTATE GAS SUPPLY, INC.'S
MOTION FOR EXPEDITED APPROVAL OF
RENEWAL OF CERTIFICATE TO PROVIDE COMPETITIVE RETAIL NATURAL
GAS SERVICE AND MEMORANDUM IN SUPPORT**

John W. Bentine, Esq. (0016388)
Trial Counsel
E-Mail: jbentine@cwslaw.com
Direct Dial: (614) 334-6121
Bobby Singh, Esq. (0072743)
E-Mail: bsingh@cwslaw.com
Direct Dial: (614) 334-6122
Chester Willcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215
(614) 221-4000 (main number)
(614) 221-4012 (facsimile)

Attorneys for Interstate Gas Supply, Inc.

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NATURAL GAS SERVICE**

I. MOTION FOR EXPEDITED APPROVAL

Pursuant to Ohio Administrative Code ("OAC") 4901-1-12(C), Interstate Gas Supply, Inc. ("IGS") respectfully moves the Public Utilities Commission of Ohio ("Commission") to expeditiously approve the renewal of IGS's certificate to operate as a provider of competitive retail natural gas services in the State of Ohio.

IGS's Renewal Certification for Retail Natural Gas Supplier ("Renewal Certification") was filed with the Commission synchronously with this Motion. IGS respectfully requests that the Commission approve IGS's Renewal Certification by no later than July 23, 2004. IGS's Renewal Certification contains all of the information and submissions required by OAC 4901:1-27 *et. seq.* and the Commission's applicable instructions.

Also filed simultaneously with this Motion is IGS's Motion for Protective Order covering certain financial and proprietary information contained in the Renewal Certification.

The grounds for the instant Motion for Expedited Approval are set forth below.

II. MEMORANDUM IN SUPPORT

By a Finding and Order issued on July 23, 2002, in the above-captioned docket, the Commission authorized IGS to provide competitive retail natural gas service ("CRNS") as a marketer in Ohio. IGS's CRNS Certificate No. 02-002 (i) was issued on July 24, 2002, effective beginning on July 23, 2002, and ending on July 23, 2004.

OAC 4901:1-27-09 requires the filing of applications to review CRNS certificates no less than thirty (30) and no more than one hundred and twenty (120) days prior to the expiration of the then-effective certificate. Inasmuch as IGS's certificate expires on July 23, 2004, the submission of IGS's Renewed Certification is outside of the time frames set forth in OAC 4901:1-27-09. In the course of business activities, IGS was late in submitting the Renewal Certification to the Commission, and IGS regrets this occurrence.

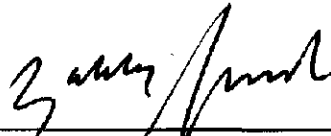
IGS serves hundreds and thousands of customers in the Choice programs of the following utilities: Columbia Gas of Ohio, Inc., Dominion East Ohio, Vectren Energy Delivery of Ohio, and Cincinnati Gas and Electric Company. Ohio Revised Code ("RC") § 4929.20 provides that no retail natural gas supplier shall provide competitive retail natural gas service to any jurisdictional consumer in Ohio without being duly certified by the Commission. IGS respectfully request the Commission to expeditiously approve IGS's Renewal Certification, so that IGS's service to the hundreds and thousands of customers that it provides services to is not jeopardized or interrupted due to a lapse in IGS's certification.

Expeditious approval by July 23, 2004, is also necessary to prevent interruption in IGS's business activities in Ohio. The Choice markets in Ohio are among the largest of IGS's Choice service businesses, and the dislocation of IGS's Ohio Choice customers back to the distribution

utilities would be devastating to IGS's business and the employees that it retains to support its Ohio Choice activities.

Wherefore, IGS respectfully requests the Commission to expeditiously approve IGS Renewal Certification and renew IGS's CRNS certification by no later than July 23, 2004.

Respectfully submitted,



John W. Bentine, Esq. (0016388)

Trial Counsel

E-Mail: jbentine@cwsllaw.com

Direct Dial: (614) 334-6121

Bobby Singh, Esq. (0072743)

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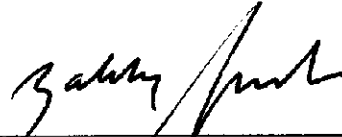
(614) 221-4000 (main number)

(614) 221-4012 (facsimile)

Attorneys for Interstate Gas Supply, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Interstate Gas Supply, Inc.'s Motion For Expedited Approval Of Renewal Of Certificate To Provide Competitive Retail Natural Gas Service And Memorandum In Support was served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on July 1, 2004.



Bobby Singh, Esq.

Gregory A. Price
Senior Staff Attorney
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215