

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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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

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**REPLY OF NORTHEAST OHIO PUBLIC ENERGY COUNCIL  
TO INTERSTATE GAS SUPPLY, INC.'S  
MEMORANDUM CONTRA MOTION TO COMPEL**

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Pursuant to Ohio Administrative Code ("OAC") Rule 4901-1-12, the Northeast Ohio Public Energy Council ("NOPEC") hereby files its Reply to Interstate Gas Supply's ("IGS") Memorandum Contra NOPEC's Motion to Compel.

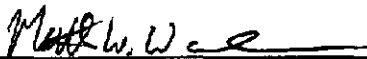
On September 29, 2010, NOPEC filed a motion to compel IGS to respond to NOPEC's First Set of Discovery Requests in this case ("NOPEC Motion to Compel"). The NOPEC Motion to Compel satisfied each of the procedural requirements in OAC Rule 4901-1-16, and explains the timeliness, relevance, and limited nature of the NOPEC discovery requests. Rather than address the repetitive arguments raised in IGS' Memorandum Contra the NOPEC Motion to Compel, which was filed on October 14, 2010, NOPEC simply incorporates by reference the arguments raised in its prior pleadings, including: 1) Reply of Northeast Ohio Public Energy Council to Interstate Gas Supply, Inc.'s Memorandum Contra Motions to Intervene and Motions for an Evidentiary Hearing, which was filed on September 10, 2010; 2) Northeast Ohio Public Energy Council's Memorandum Contra Motion for Protective Order of Interstate Gas Supply, Inc., which was filed on September 16, 2010; 3) NOPEC's Motion to Compel, which was filed on September 29, 2010; and 4) Northeast Ohio Public Energy Council's Memorandum Contra

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Motion of NiSource Corporate Services Company to Quash Subpoena, which was filed on October 19, 2010. In addition, NOPEC supports the arguments posited by OCC in its Reply filed on October 14, 2010 and supporting OCC's own motion to compel against IGS.

For the foregoing reasons, the Commission should reject the arguments in IGS' Memorandum Contra, and grant NOPEC's motion to compel.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following parties of record by regular U.S. mail and e-mail, this 20<sup>th</sup> day of October 2010.

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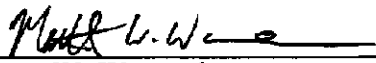
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