## **BEFORE**

## THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term Forecast	)	
Report of Natural Gas Demand and Gas	)	Case No. 11-1376-GA-FOR
Supply of Northeast Ohio Natural Gas	)	
Corporation	)	

MOTION OF NORTHEAST OHIO NATURAL GAS CORPORATION TO EXTEND LONG-TERM FORECAST REPORT DUE DATE TO AUGUST 1, 2011

Northeast Ohio Natural Gas Corporation by and through its counsel, hereby moves for an extension of the filing date for its 2011 Long-Term Forecast Report from June 1, 2011 to August 1, 2011. Movant is authorized to state that the Commission Staff does not oppose the requested extension of the filing deadline. Good cause exists for this extension of time to file the Long-Term Forecast Report as demonstrated in the attached Memorandum in Support

WHEREFORE, Northeast Natural Gas Corporation requests that the filing date for its 2011 Long-Term Forecast Report be revised to August 1, 2011.

Respectfully submitted,

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## MEMORANDUM IN SUPPORT

Ohio Administrative Code Rule 4901:5-3-01(B) requires that all gas and natural gas companies required by Ohio Revised Code Section 4935.04 to file a long-term forecast report must do so on or before June 1 annually. Because Northeast Ohio Natural Gas Corporation ("Northeast Ohio") now serves more than 15,000 customers, it is required to file its first such report on or before June 1, 2011. However, Rule 4901:5-3-01(D) also states that the Commission may grant an extension of the filing deadline for good cause shown.

Inasmuch as this is its first long-term forecast report, and because of competing demands on the resources of its professional and clerical staff, Northeast Ohio submits that in order to devote the attention to this initial report that it demands, good cause exists to extend the initial report date from June 1, 2011 to August 1, 2011. This extension will enable Northeast Ohio to meet the reporting requirements uniformly and completely and without prejudice to any potential party to these proceedings. In the absence of the requested extension, Northeast Ohio submits that it may not be able to comply uniformly and completely.

Commission Staff has authorized Northeast Ohio to state that Staff has no objection to the requested extension.

## Respectfully submitted,

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Summary: Motion To Extend Long-Term Forecast Report electronically filed by Mr. Andrew J Sonderman on behalf of Northeast Ohio Natural Gas Corporation