

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     )

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

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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 August 1, 2011 to a date sixty (60) days subsequent to date on which the Commission issues its Finding and Order in Case No. 10-209-GA-GCR. Northeast Ohio 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 extended as requested herein.

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 now has more than 15,000 customers, it is subject to this requirement. By Order entered on May 2, 2011 the Attorney Examiner granted Northeast Ohio's Motion to extend the June 1 date for the filing of its initial long-term forecast report to August 1 based on the competing demands on the time of its small professional and clerical staff.

Those competing demands in large measure related to the preparation for, and participation in evidentiary hearings in Case No. 10-209-GA-GCR, *In the Matter of the Regulation of the Purchased Gas Adjustment Clause Contained Within the Rate Schedules of Northeast Ohio Natural Gas Corporation and Related Matters*. This case was consolidated for evidentiary hearing and decision with Case No. 10-212-GA-GCR, *In the Matter of the Regulation of the Purchased Gas Adjustment Clause Contained in the Rate Schedules of Orwell Natural Gas Company and Related Matters*.

Recommendations contained in the Staff Report submitted in those consolidated cases, if adopted by the Commission, would impact the gas supply projections to be reflected in the long-term forecast report to be submitted in this proceeding. However, evidentiary proceedings in those consolidated cases concluded on May 23, and the briefing schedule of the parties calls for Reply Briefs to be served on July 13. Even if a Finding and Order were to be entered immediately, there would be insufficient time for Northeast Ohio to evaluate it and reflect its findings thoughtfully and completely in its initial long-term forecast report.

Northeast Ohio requests that the filing date for its initial long-term forecast report be set at sixty days after the entry of the Commission's Finding and Order in Case No. 10-209-GA-GCR. This extension will enable Northeast Ohio take into account that Finding and Order in meeting the reporting requirements uniformly and completely and without prejudice to any potential party to these proceedings.

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 electronically filed by Mr. Andrew J Sonderman on behalf of Northeast Ohio Natural Gas Corporation