



December 12, 2011

Ms. Betty McCauley, Secretary
Public Utilities Commission of Ohio
Docketing Division, 11th Floor
180 E. Broad St.
Columbus, OH 43215-3793

Re: Commission's Review of the Alternative Rate Plan and Exemption Rules Contained in
Chapter 4901:1-19 of the Ohio Administrative Code, Case No. 11-5590-GA-ORD.

Dear Ms. McCauley:

On December 2, 2011, Columbia Gas of Ohio, Inc. ("Columbia") and the East Ohio Gas Company d/b/a Dominion East Ohio ("Dominion") filed a Joint Motion ("Joint Motion") seeking an extension of the established dates for filing Comments and Reply Comments in the above captioned matter. In addition, Columbia and Dominion requested a technical conference "to clarify the proposed changes and to help [Columbia and Dominion] gain a better understanding of the reasoning behind the proposed changes." On December 7, 2011, Duke Energy Ohio, Inc. ("Duke") filed a Motion ("Duke Motion") requesting an extension of the procedural schedule, and request for expedited treatment.

This letter is sent to confirm that the Office of the Ohio Consumers' Counsel ("OCC") will not be filing a Memorandum Contra to the Joint Motion filed on December 2, 2011, or to Duke's Motion, and that OCC does not object to the request for expedited treatment in Duke's Motion.

Furthermore, OCC finds merit in Columbia and Dominion's request for a technical conference. The proposed rules, as Columbia and Dominion have articulated "are expansive and involve a number of new, complex proposals including a procedure for exiting the merchant function." The existing rules in this Chapter provide for a technical conference. Ohio Adm. Code 4901:1-19-09 (B) states:

(B) Technical and settlement conferences

The commission staff or an attorney examiner may, at any time, schedule a settlement or technical conference or meeting to discuss and consider issues raised by either type of application and, if available, the testimonies or comments filed by the commission staff and the intervenors in the proceeding. The commission may appoint an attorney examiner or other commission staff to act as a facilitator at the settlement conference or meeting.

Ms. Betty McCauley, Secretary
December 12, 2011
Page Two

Inasmuch as the proposed rules have the potential to significantly impact the way regulated gas utilities provide natural gas commodity service to customers, and the manner in which their customers arrange for such service, OCC supports the request for a technical conference.

In light of the upcoming holidays, OCC requests the Commission first set a date for the technical conference, and subsequent to the technical conference, the Commission should modify the procedural schedule by reestablishing dates for interested parties to file Comments and Reply Comments.

Thank you very much for your attention to this matter.

Sincerely,

/s/ Larry S. Sauer
Larry S. Sauer
Assistant Consumers' Counsel

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in

Case No(s). 11-5590-GA-ORD

Summary: Correspondence Letter in Support of Extension by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Sauer, Larry S.