BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Purchased Gas Adjustment Clauses

Case Nos. 12-209-GA-GCR

Contained Within the Rate Schedules of

12-212-GA-GCR

Northeast Ohio Natural Gas Corporation

and Orwell Natural Gas Company.

Case Nos. 12-309-GA-UEX

In the Matter of the Regulation of the Uncollectible Expense Riders of

12-312-GA-UEX

Northeast Ohio Natural Gas Corporation

and Orwell Natural Gas Company.

MOTION FOR SUBPOENAS

The Staff of the Public Utilities Commission of Ohio (Staff) hereby moves for subpoenas to compel the attendance at hearing and the fact testimony of the following individuals:

- Rebecca Howell
- Jonathan Harrington

Ms. Howell is currently the Corporate Controller for Gas Natural, Inc., the parent company of Northeast Ohio Natural Gas Corporation and Orwell Natural Gas Company ("Companies"). Ms. Howell testified in the prior Gas Cost Recovery ("GCR") cases for these Companies, and intimately familiar with the Companies' management and gas purchasing practices. Mr. Harrington previously held the same position, and has comparable knowledge of the Companies' management practices. Staff respectfully submits that both witnesses are necessary to create an adequate record upon which the Commission can make an informed decision on Staff's recommendations in these cases.

In addition, Staff hereby notifies the parties that it will also call Heather Lipnis, also a former Corporate Controller, and Cindy Bates, Companies' former accountant, to testify in this proceeding. As both Ms. Lipnis and Ms. Bates are voluntarily testifying as interested fact witnesses, neither requires a subpoena to compel their attendance, and no subpoena is sought.

Copies of the subpoenas signed by the Attorney Examiner are attached hereto and incorporated by reference.

Respectfully submitted,

Werner L. Margard

Devin Parram

werner.margard@puc.state.oh.us

devin.parram@puc.state.oh.us

Assistant Attorneys General

Public Utilities Section

180 East Broad Street, 6th Floor

Columbus, OH 43215-3793

(614) 466-4395

FAX: (614) 644-8764

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Subpoenas** was served by regular U.S. mail, postage prepaid, and electronically by e-mail, upon the parties of record on this 3rd day of July, 2013.

Werner L. Margard III
Assistant Attorney General

PARTIES OF RECORD:

Mark Yurick Zachary D. Kravitz Taft Stettinuis & Hollister LLP 65 E. State Street Suite 1000 Columbus OH 43215

Joseph P. Serio Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, Ohio 43215-3485

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

SUBPOENA

TO:

Rebecca Howell Corporate Controller Gas Natural, Inc. 8500 Station Street, Suite 100 Mentor, OH 44060

Upon application of the Staff of the Public Utilities Commission of Ohio, you are hereby required to appear before the Public Utilities Commission of Ohio as a witness for Staff in the following proceeding:

Case Title: In the Matter of the Regulation of the Purchased Gas Adjustment Clauses

Contained Within the Rate Schedules of Northeast Ohio Natural Gas

Corporation, et al.

Case Nos.: 12-0209-GA-GCR, 12-212-GA-GCR

You are to appear at the offices of the Commission, 180 East Broad Street, Columbus, Ohio, on the 9th day of July, 2013, at 9:00 a.m. in hearing room 11-C.

Dated at Columbus, Ohio, this 3rd day of July, 2013.

Attorney Examiner

Notice: If you are not a party or an officer, agent, or employee of a party to this proceeding, then witness fees for attending under this subpoena are to be paid by the party at whose request the witness is summoned. Every copy of this subpoena for the witness must contain this notice.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

SUBPOENA

TO:

Jonathan Harrington 100 East Campus View Blvd., Suite 115 Columbus, Ohio 43235

Upon application of the Staff of the Public Utilities Commission of Ohio, you are hereby required to appear before the Public Utilities Commission of Ohio as a witness for Staff in the following proceeding:

Case Title: In the Matter of the Regulation of the Purchased Gas Adjustment Clauses

Contained Within the Rate Schedules of Northeast Ohio Natural Gas

Corporation, et al.

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Attorney Examiner

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This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 12-0209-GA-GCR, 12-0212-GA-GCR, 12-0309-GA-UEX, 12-0312-GA-UEX

Summary: Motion Motion for Subpoenas electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO