

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Application of Duke)
Energy Ohio, Inc. for Authority to Establish)
a Standard Service Offer Pursuant to R.C.) Case No. 14-841-EL-SSO
4928.143, in the Form of an Electric)
Security Plan, Accounting Modifications,)
and Tariffs for Generation Service.)

In the Matter of Application of Duke) Case No. 14-842-EL-ATA
Energy Ohio, Inc. for Authority to Amend)
its Certified Supplier Tariff, P.U.C.O. No.)
20.

**MOTION TO SUBSTITUTE TESTIMONY AND TO SUBMIT SUPPLEMENTAL
TESTIMONY AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY,
INC. AND REQUEST FOR EXPEDITED RULING**

Joseph Olikar (0086088)
Counsel of Record
Email: joliker@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

***Attorney for
Interstate Gas Supply, Inc.***

November 10, 2014

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Application of Duke)	
Energy Ohio, Inc. for Authority to Establish)	
a Standard Service Offer Pursuant to R.C.)	Case No. 14-841-EL-SSO
4928.143, in the Form of an Electric)	
Security Plan, Accounting Modifications,)	
and Tariffs for Generation Service.)	

In the Matter of Application of Duke)	Case No. 14-842-EL-ATA
Energy Ohio, Inc. for Authority to Amend)	
its Certified Supplier Tariff, P.U.C.O. No.)	
20.		

**MOTION TO SUBSTITUTE TESTIMONY AND TO SUBMIT SUPPLEMENTAL
TESTIMONY AND REQUEST FOR EXPEDITED RULING**

Interstate Gas Supply, Inc. ("IGS" or "IGS Energy"), requests leave to substitute testimony to reflect that Joseph Haugen will adopt the previously-filed testimony of Tim Hamilton, as explained in the attached memorandum in support. Additionally, IGS requests leave to file supplemental testimony containing background and personal information with respect to Joseph Haugen.

In accordance with Rule 4901-1-12(C), Ohio Admin. Code, IGS requests an expedited ruling in response to these requests.

Prior to filing this motion, IGS presented its request to the Attorney Examiners and parties present at the ongoing proceedings. No party has indicated that it opposes the relief requested in this motion or an expedited ruling.

Respectfully submitted,

/s/Joseph Olikier

Joseph Olikier (0086088)
Counsel of Record
Email: joliker@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

***Attorney for
Interstate Gas Supply, Inc.***

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Application of Duke)	
Energy Ohio, Inc. for Authority to Establish)	
a Standard Service Offer Pursuant to R.C.)	Case No. 14-841-EL-SSO
4928.143, in the Form of an Electric)	
Security Plan, Accounting Modifications,)	
and Tariffs for Generation Service.)	

In the Matter of Application of Duke)	Case No. 14-842-EL-ATA
Energy Ohio, Inc. for Authority to Amend)	
its Certified Supplier Tariff, P.U.C.O. No.)	
20.		

MEMORANDUM IN SUPPORT

On September 26, 2014, IGS Energy filed in these proceedings a confidential version and public version of the Testimony of Tim Hamilton. Since that time, Mr. Hamilton was injured and cannot testify in his current condition. Accordingly, IGS requests that the Commission permit Joseph Haugen to adopt Tim Hamilton's testimony.

Mr. Haugen is a Senior Supply and Schedule Analyst for IGS Energy. He has been involved at each stage of these proceedings. Mr. Haugen has substantial experience in wholesale and retail energy markets. His testimony will assist the Commission in making a determination on Duke's application in these proceedings.

Concurrently with this Motion, IGS has filed the Supplemental Testimony of Joseph Haugen to reflect Mr. Haugen's background information. Otherwise, the substance and content of Mr. Hamilton's testimony will remain identical. If the motion

and request for expedited ruling is granted, Mr. Haugen would simply sponsor his Supplemental Testimony as well as the Testimony of Tim Hamilton during the hearing.

Accordingly, the Commission should grant IGS permission to allow Joseph Haugen to adopt Tim Hamilton's testimony and to submit supplemental testimony.

Respectfully submitted,

/s/Joseph Oliker

Joseph Oliker (0086088)
Counsel of Record
Email: joliker@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

***Attorney for
Interstate Gas Supply, Inc.***

CERTIFICATE OF SERVICE

I certify that this *Motion to Substitute Testimony and to Submit Supplemental Testimony and Memorandum in Support of Interstate Gas Supply, Inc. and Request for Expedited Ruling* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 10 day of November, 2014. The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

Duke Energy Ohio, Inc.; Ohio Energy Group; Ohio Manufacturers' Association; Industrial Energy Users-Ohio; FirstEnergy Solutions Corp.; Dayton Power and Light Company; Staff of the Public Utilities Commission of Ohio; Energy Professionals of Ohio; Constellation New Energy, Inc.; Retail Energy Supply Association; Office of the Ohio Consumers' Counsel; Direct Energy Services, LLC and Direct Energy Business, LLC; Wal-Mart Stores East, LP and Sam's East, Inc.; Sierra Club; The Greater Cincinnati Health Council; The City of Cincinnati; Natural Resource Defense Council; Ohio Partners for Affordable Energy; EnerNOC, Inc.; The Kroger Company; Ohio Environmental Council; Ohio Power Company; People Working Cooperatively, Inc.; Environmental Law and Policy Center.

/s/ Joseph Olikier

Joseph Olikier

***Attorney for
Interstate Gas Supply, Inc.***

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/10/2014 10:42:50 AM

in

Case No(s). 14-0841-EL-SSO, 14-0842-EL-ATA

Summary: Motion to Substitute Testimony and to Submit Supplemental Testimony and Request for Expedited Ruling electronically filed by Mr. Joseph E. Olikier on behalf of IGS Energy