

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company and The Toledo)	Case No. 14-1297-EL-SSO
Edison Company for Authority to Provide)	
for a Standard Service Offer Pursuant to)	
R.C. 4928.143 in the Form of an Electric)	
Security Plan)	

**MOTION FOR EXTENSION OF FILING DEADLINE AND MEMORANDUM IN
SUPPORT AND REQUEST FOR EXPEDITED TREATMENT OF INTERSTATE GAS
SUPPLY, INC.**

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June 15, 2015

**BEFORE
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In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company and The Toledo)	Case No. 14-1297-EL-SSO
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**MOTION FOR EXTENSION OF FILING DEADLINE AND REQUEST FOR EXPEDITED
TREATMENT**

Pursuant to Rule 4901-1-12, 4901-1-13 and 4901-1-15, Ohio Administrative Code ("OAC"), Interstate Gas Supply, Inc. ("IGS Energy" or "IGS") hereby moves the Public Utilities Commission of Ohio ("Commission") to extend the deadline for filing IGS's reply to the interlocutory appeals submitted by Duke Energy Ohio, Inc. ("Duke") and Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company's (collectively "FirstEnergy") until Wednesday, June 17, 2015. IGS has contacted Duke's counsel and FirstEnergy's counsel and they do not oppose the motion.

For the reasons stated in the attached memorandum in support, IGS requests that the Commission grant this motion. IGS requests that the Commission grant this motion on an expedited basis.

Respectfully submitted,

/s/ Joseph Olikier
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MEMORANDUM IN SUPPORT

At a discovery conference on June 2, 2015, the Attorney Examiner denied third party Duke's motion to quash a subpoena to produce a prior forecast created by witness Judah Rose. Duke and FirstEnergy filed interlocutory appeals on June 8, 2015.

Under Rule 4901-1-15(D), OAC, "[u]nless otherwise ordered by the commission, any party may file a memorandum contra within five days after the filing of an interlocutory appeal." Thus, IGS's reply would normally be due on Monday, June 15, 2015. The deadline, however, may be modified by the Commission on its own initiative or in response to a motion of a party. See Rule 4901-1-12, OAC; Rule 4901-1-13, OAC; Rule 4901-1-15, OAC.

Due to unanticipated, unavoidable events outside of the control of IGS's counsel, IGS requests additional time to prepare and file its reply to the interlocutory appeals. Both Duke and FirstEnergy have indicated that they do not oppose extending the filing deadline until Wednesday, June 17, 2015. Because the proposed extension is of limited duration and is otherwise reasonable, the Commission should grant this motion.

Furthermore, because the parties impacted by this motion do not oppose the relief requested herein, there is no need to receive additional pleadings. Thus, the Commission should grant this motion on an expedited basis.

Respectfully submitted,

/s/ Joseph Olikier

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CERTIFICATE OF SERVICE

I certify that this Motion to Extend Filing Deadline and Memorandum in Support and Request for Expedited Treatment was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 15th day of June, 2015 and electronically served to the following parties:

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/s/ Joseph Olier

Counsel for Interstate Gas Supply, Inc.

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Case No(s). 14-1297-EL-SSO

Summary: Motion for Extension of Filing Deadline and Memorandum in Support and Request for Expedited Treatment electronically filed by Mr. Joseph E. Olikier on behalf of IGS Energy