BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the matter of the Regulation of the Purchased Gas Adjustment Clause Contained Within the Rate Schedules of:

ithin the Rate Schedules of:

Eastern Natural Gas Company : Case No. 15-207-GA-GCR
Pike Natural Gas Company : Case No. 15-214-GA-GCR
Southeastern Natural Gas Company and : Case No. 15-215-GA-GCR

Related Matters.

In the Matter of the Uncollectible Expense

Riders of:

Eastern Natural Gas Company : Case No. 15-307-GA-UEX Pike Natural Gas Company and Related : Case No. 15-314-GA-UEX

Matters.

In the Matter of the Percentage of Income Payment Plan Riders of:

Eastern Natural Gas Company : Case No. 15-407-GA-PIP
Pike Natural Gas company : Case No. 15-414-GA-PIP

Southeastern Natural Gas Company and : Case No. 15-415-GA-PIP

Related Matters. :

MOTION FOR PARTIAL WAIVER AND REQUEST FOR EXPEDITED RULING

Pursuant to Rules 4901-1-12, 4901-1-13 and 4901-1-14 of the Ohio Administrative Code, Eastern Natural Gas Company, Pike Natural Gas Company, Southeastern Natural Gas Company (the "Companies") respectfully moves for a partial waiver from Rule 4901:1-14-08 (C)(2) from the requirement that customers be notified of the Gas Cost Recovery ("GCR") hearing no more than 30 days prior to the scheduled date of the hearing. The Companies respectfully request that they be permitted to notify their customers approximately 42 days in advance of the hearing. The reasons supporting this motion are set forth in the accompanying memorandum in support.

WHEREFORE, Eastern Natural Gas Company, Pike Natural Gas Company and Southeastern Natural Gas Company respectfully request that the Attorney Examiner expeditiously grant this motion for a partial waiver and allow the Companies to notify their customers of the GCR hearing approximately 42 days prior to the scheduled hearing.

Respectfully submitted,

Stephen M. Howard

Vorys, Sater, Seymour and Pease LLP

52 East Gay Street, P. O. Box 1008

Columbus, Ohio 43216-1008

(614) 464-5401

smhoward@vorys.com

Attorneys for Eastern Natural Gas Company, Pike Natural Gas Company and Southeastern Natural Gas Company

MEMORANDUM IN SUPPORT

On November 24, 2015, the Attorney Examiner re-scheduled the hearings in these matters for February 24, 2016. Rule 4901:1-14-08(C)(2) of the Ohio Administrative Code requires the Companies to notify their customers no more than 30 days prior to the scheduled date of a GCR hearing. The rule allows the Companies to notify their customers in a variety of ways and one of the ways is via bill message or bill insert included with customer bills. Because the Companies are undergoing previously scheduled financial audits during the latter part of January, the bills must be sent out prior to January 25, 2016, the 30th day before the February 24 GCR hearing. Bills containing the notice of the GCR hearing are anticipated to be mailed out to customers sometime after January 13, 2016 but before January 25, 2016.

Because of the need to submit the bills by mid-January, the Companies will be unable to notify the customers within the window of 15 to 30 days prior to the February 24, 2016 scheduled hearing. However, the Companies are planning to notify customers of the GCR hearing via bill message or bill insert by mid-January, 2016. The Companies submit that little, if any, prejudice will occur by notifying customers of the GCR hearing 42 days in advance of the hearing as opposed to 30 days in advance of the hearing. Good cause exists for granting this partial waiver on an expedited basis.

The undersigned indicates that he has contacted Assistant Attorney General Thomas Lindgren with this proposed request and that the Staff of the Commission does not object. The Companies respectfully request that the Attorney Examiner grant this motion for a partial waiver on an expedited basis.

Respectfully submitted,

Stephen M. Howard

Vorys, Sater, Seymour and Pease LLP 52 East Gay Street, P. O. Box 1008 Columbus, Ohio 43216-1008

(614) 464-5401

smhoward@vorys.com

Attorneys for Eastern Natural Gas Company, Pike Natural Gas Company and Southeastern Natural Gas Company

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served upon Thomas.Lindgren@puc.state.oh.us this 8th day of January, 2016.

Stephen M. Howard

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/8/2016 11:03:17 AM

in

Case No(s). 15-0207-GA-GCR, 15-0214-GA-GCR, 15-0215-GA-GCR, 15-0407-GA-PIP, 15-0414-GA-PIP

Summary: Motion For Partial Waiver and Request for Expedited Ruling electronically filed by Mr. Stephen M Howard on behalf of Eastern Natural Gas Company and Pike Natural Gas Company and Southeastern Natural Gas Company