

In the Matter of the Commission's )  
Investigation into Ohio Rural Natural Gas ) Case No.16-1578-GA-COI  
Co-op and Related Matters )

Now comes Ohio Rural Natural Gas Co-op, by and through counsel, pursuant to section 4901-1-14 of the Ohio Administrative Code, and respectfully requests that the case schedule in this matter be continued by one month. The parties' direct testimony is currently due on August 16, 2016, and a hearing date is set for August 23, 2016. Ohio Rural Natural Gas Co-op respectfully requests that the deadline for direct testimony be extended to September 15, 2016, and the hearing date be set for September 22, 2016. A Memorandum in Support is attached.

/s/ Richard R. Parsons  
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Attorneys for ORNG CO-OP

## **MEMORANDUM IN SUPPORT**

Ohio Rural Natural Gas Co-op (“ORNG Co-op”) respectfully seeks a continuance of the case schedule in this matter to provide it with sufficient time to prepare direct testimony and for the hearing regarding the allegations of noncompliance contained in the Staff Report that is the subject of this case. The undersigned received service of the Scheduling Entry (the “Entry”) in this matter yesterday, August 8, 2016. The Entry sets a deadline of August 16, 2016, for the parties’ direct testimony and a hearing date of August 23, 2016. Thus, under the Entry the undersigned and ORNG Co-op have eight calendar days in which to prepare direct expert testimony and fifteen days to prepare for an evidentiary hearing. Staff, however, has had the past nine months to prepare its Report. ORNG Co-op respectfully submits that a one month continuance of the case schedule is appropriate under this circumstance.

Moreover, the twenty-one-page Report alleges numerous instances of noncompliance. ORNG Co-op takes these allegations very seriously and has been working diligently to rectify the instances of noncompliance that have been areas of concern. It needs time to prepare expert testimony and for a hearing to cogently address the issues the Report raises. In addition, the \$600,000.00 forfeiture that Staff seeks would put ORNG Co-op out of business, leaving numerous rural customers without natural gas service. Given that the outcome of this case will determine the viability of ORNG Co-op as a natural gas company, due process and fundamental fairness require that ORNG Co-op be permitted sufficient time to prepare and present its case.

Beyond due process considerations, Mr. Dortch was out of the office last week and has depositions scheduled for August 23, 2016, in another matter. These depositions were extremely difficult to schedule due to the deponents’ international travel obligations. Further, the

undersigned's uncle died today, and he must travel out-of-town on Friday through the weekend to attend the funeral and assist his family with related matters.

For the foregoing reasons, ORNG Co-op respectfully requests that the hearing schedule in the matter be continued by one month, thereby making direct testimony due on September 15, 2016, and a hearing date of September 22, 2016.

Respectfully submitted,

/s/ Richard R. Parsons  
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**CERTIFICATE OF SERVICE**

The PUCO's e-filing system will serve notice of this filing upon counsel for the for the Complainant, the Ohio Consumers' Council, and the Staff of the Public Utilities Commission of Ohio.

Further, I hereby certify that a true and accurate copy of the foregoing was served upon the following on this August 9, 2016, by electronic mail:

Vesta R. Miller  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215  
Email: Vesta.Miller@puc.state.oh.us

/s/ Richard R. Parsons  
Richard R. Parsons

**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 16-1578-GA-COI**

Summary: Motion Motion to Continue Case Schedule electronically filed by Mr. Richard R Parsons on behalf of Ohio Rural Natural Gas Co-op