

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|---|------------------------|
| In the Matter of the Regulation of the | : | |
| Purchased Gas Adjustment Clauses | : | |
| Contained Within the Rate Schedules | : | |
| of: | : | |
| | : | Case No. 16-206-GA-GCR |
| Brainard Gas Corporation | : | Case No. 16-209-GA-GCR |
| Northeast Ohio Natural Gas | : | Case No. 16-212-GA-GCR |
| Corporation | : | |
| Orwell Natural Gas Company and | : | |
| Related Matters. | : | |
| | : | |
| In the Matter of the Uncollectible | : | |
| Expense Riders of: | : | Case No. 16-309-GA-UEX |
| | : | Case No. 16-312-GA-UEX |
| | : | |
| Northeast Ohio Natural Gas | : | |
| Corporation | : | |
| Orwell Natural Gas Company and | : | Case No. 16-409-GA-PIP |
| Related Matters. | : | |
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| | : | |
| In the Matter of the Percentage of | : | |
| Income Payment Plan Rider of | : | |
| Northeast Ohio Natural Gas | : | |
| Corporation and Related Matters. | : | |

**MOTION FOR EXTENSION OF TIME TO FILE AUDIT REPORTS,
AND FOR CONTINUANCE OF HEARING,
ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO
AND REQUEST FOR EXPEDITED CONSIDERATION**

The Staff of the Public Utilities Commission of Ohio (“Staff”) respectfully requests that it be granted an extension of the time by which audit reports ordered in these cases must be filed, and a continuance of the hearing in the above-captioned cases.

By *Entry* dated February 24, 2016, the Public Utilities Commission of Ohio (“Commission”) directed Staff to initiate gas cost recovery (“GCR”) financial audits for

Brainard Gas Company (“Brainard”), Northeast Ohio Natural Gas Corporation (“Northeast”), and Orwell Natural Gas Company (“Orwell”) (collectively, “companies”). *Entry* (Feb. 24, 2016) at ¶3. Staff was further directed to file its GCR audit report with respect to each company 60 days before the company’s hearing date. *Id.* at ¶5. The hearing date for all three companies was originally set for January 17, 2017. *Id.* at ¶6.

That *Entry* also ordered Staff to conduct audits of the uncollectible expense (“UEX”) riders of Northeast and Orwell, and to file its audit reports concurrently with the GCR audit reports. *Id.* at ¶¶9-10. Further, the *Entry* ordered Staff to conduct an audit of Northeast’s percentage of payment plan (PIPP) rider. That audit report was likewise to be filed concurrently with the GCR audit report. *Id.* at ¶¶11-12.

By *Entry* dated May 11, 2016, the Public Utilities Commission of Ohio (“Commission”) ordered, pursuant to a stipulation approved by the Commission¹, that a management / performance audit (“M/PA”) be conducted of the companies. The Commission authorized the issuance of a Request for Proposals to select an independent auditor to conduct the M/PA, and ordered that its report be filed no later than November 18, 2016. *Entry* (May 11, 2016) at ¶4. By subsequent *Entry*, the Commission extended the date for filing of the M/PA report until February 10, 2017. *Entry* (July 20, 2016) at ¶6. In light of the extension of the due date for the M/PA report, the Commission continued the hearing date for all of the above-captioned cases until April 14, 2017. *Entry* (July 20, 2016) at ¶14.

¹ *In re Brainard Gas Corp., Northeast Ohio Natural Gas Corp., and Orwell Natural Gas Co.*, Case No. 14-206-GA-GCR, *et al.*, Opinion and Order (Oct. 21, 2015) at 11-12.

Staff represents that the M/PA auditor has requested additional time in which to finalize and file its report. Staff has been assured that the MP/A report can be completed and filed within two (2) weeks, and therefore respectfully requests that it be granted an extension until February 24, 2017 by which to file all of the audit reports ordered in these cases. Inasmuch as this extension will require a continuance of the scheduled hearing date, Staff further requests that the date of the hearing also be adjusted. To accommodate the schedules of all of the parties, Staff represents that all parties are willing to assent to a hearing date during the week of May 1, 2017.

Staff has contacted all parties to this matter, and none objects to the granting of this request for an extension of time. Furthermore, no party objects to the continuance of the hearing until the week of May 1, 2017.

WHEREFORE, Staff respectfully requests that this motion be granted without delay, and that the Commission issue an order granting an extension until February 24, 2017 by which all audit reports must be filed, and schedule a hearing during the week of May 1, 2017.

Respectfully submitted,

/s/Werner L. Margard III

Werner L. Margard III

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Extension of Time **Motion For Extension of Time to File Audit Reports, and for Continuance Of Hearing, and Request For Expedited Consideration** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by electronic mail upon the following parties of record, this 10th day of February, 2017.

/s/Werner L. Margard III

Werner L. Margard III

Assistant Attorney General

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Case No(s). 16-0206-GA-GCR, 16-0209-GA-GCR, 16-0212-GA-GCR, 16-0309-GA-UEx, 16-0312-GA-UEx

Summary: Motion For Extension of Time to File Audit Reports, and For Continuance of Hearing on Behalf of the Staff of the Public Utilities Commission of Ohio and Request for Expedited Consideration. electronically filed by Ms. Tonnetta Scott on behalf of PUC