

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The )	
East Ohio Gas Company d/b/a Dominion )	Case No. 17-0820-GA-ATA
East Ohio for Approval of Changes in )	
Rules and Regulations )	

**MOTION TO HOLD PROCEEDINGS IN ABEYANCE  
AND MEMORANDUM IN SUPPORT OF  
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

In accordance with Ohio Adm. Code 4901-1-12(A), The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company) respectfully requests that the Commission issue an entry holding these proceedings in abeyance until such time as DEO submits an additional filing seeking review of the precedent agreement currently under negotiation. In view of the upcoming May 22, 2017 deadline for reply comments, DEO requests that this motion be granted on an expedited basis. No party objects to these requests. Good cause exists to grant these requests for the reasons that follow.

On March 24, 2017, DEO filed its application in this case and requested expedited treatment. About one month later, the Commission issued an entry calling for comments and reply comments. On May 10, the Retail Energy Supply Association (RESA) and The Office of the Ohio Consumers' Counsel (OCC) filed comments. Reply comments are due on May 22.

When DEO filed its application and requested expedited treatment, it had reason to believe that a precedent agreement with the pipeline's developer would soon be executed, with federal regulatory review then to proceed apace. Contrary to that expectation, an agreement has not yet been executed and negotiations remain ongoing. Until the precedent agreement is finalized, many of the issues raised in RESA's and OCC's comments cannot be concretely addressed, and any reply comments filed at this time would necessarily be incomplete and

premature. Moreover, as DEO has further considered the arrangement, including with the benefit of RESA's and OCC's comments, the Company believes that it would be appropriate also to file the precedent agreement for review by the Commission and other interested parties. At the time the agreement is filed, the nature and extent of any additional proceedings can be addressed.

Counsel for DEO has contacted counsel for RESA, Interstate Gas Supply, and OCC and certifies that they object neither to the request to hold these proceedings in abeyance nor to expedited consideration.

For these reasons, DEO requests that the Commission consider this motion on an expedited basis, issue an entry holding these proceedings in abeyance until such time as the Company executes a precedent agreement with the pipeline developer and files that agreement for Commission review, and grant any other necessary relief.

Dated: May 18, 2017

Respectfully submitted,

/s/ Andrew J. Campbell

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ATTORNEYS FOR THE EAST OHIO GAS  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served by electronic mail to the following persons this 18th day of May, 2017:

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**Case No(s). 17-0820-GA-ATA**

Summary: Motion to Hold Proceedings in Abeyance electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio