

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ORWELL NATURAL GAS)	
COMPANY,)	
)	
)	Case No.: 16-2419--GA-CSS
Complainant,)	
)	
vs.)	
)	
ORWELL-TRUMBULL PIPELINE)	
COMPANY, LLC,)	
)	
)	
Respondent.)	

**ORWELL-TRUMBULL PIPELINE, LLC’S
UNOPPOSED MOTION FOR AN EXTENTION OF TIME TO FILE ITS REPLY TO
ORWELL NATURAL GAS COMPAY’S MEMORANDUM CONTRA**

Pursuant to Rule 4901-1-13 of the Ohio Administrative Code (“O.A.C.”), Orwell-Trumbull Pipeline Company, LLC (“OTPC”) respectfully requests an extension of time to file its Reply (“Reply”) to Orwell Natural Gas Company’s (“ONG”) Memorandum Contra (“Memo Contra”) to OTPC’s Motion to Dismiss (“Motion”). Specifically, OTPC requests seventeen (17) additional days in which to file its Reply.

O.A.C. §4901-1-13 requires that a Motion for an Extension of Time must be filed in a timely manner before the established filing date to consider that: (1) good cause exists to grant the Motion for an Extension of Time; and (2) an Extension of Time will not disadvantage the other parties to the case.

In this case, OTPC filed its Motion on July 7, 2017. Then, pursuant to O.A.C. §4901-1-13(B)(1), ONG has fifteen (15) days to file its Memo Contra. ONG filed its Memorandum Contra on July 24, 2017. Finally, once the Memo Contra is filed, OTPC has seven (7) days to

file its Reply pursuant to O.A.C. §4901-1-13(B)(2). O.A.C. §4901-1-13(B)(2) creates a due date of July 31, 2017 for the Reply.

A. OTPC Has Good Cause To Request An Extension of Time to File Its Reply.

OTPC has good cause to Request an extension of time to file its Reply from the Public Utilities Commission of Ohio (“PUCO” or “Commission”). Specifically, OTPC is being represented by Michael D. Dortch and Justin M. Dortch of the law firm, Kravitz, Brown & Dortch, LLC (“OTPC’s Attorneys”) in this case. OTPC’s Attorneys will be out of the State of Ohio on the day OTPC’s Reply is due and will be in a location that does not have internet access. Due to their absence from Ohio, OTPC’s would be unable to personally file OTPC’s Reply with the commission. In addition, because OTPC’s Attorneys will be in a location that does not have internet access, they will be unable to file OTPC’s Reply via the Commission’s Docketing Information System.

B. ONG Will Not Be Disadvantaged By An Extension of Time.

ONG will not be disadvantaged if the Commission GRANTS OTPC’s Motion for an Extension of Time. First, the Commission’s rules do not allow for ONG to file a response to OTPC’s Reply. Second, ONG has agreed not to oppose OTPC’s Motion for an Extension which demonstrates that it does not feel that it will be disadvantaged by an extension of time.

For these reasons, OTPC respectfully requests that the Commission GRANT its Motion for an Extension of Time to File its Reply.

Respectfully submitted,

/s/ Michael D. Dortch

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ORWELL-TRUMBULL

PIPELINE COMPANY, LLC

CERTIFICATE OF SERVICE

The PUCO's e-filing system will serve notice of this filing upon counsel for the Complainant 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 counsel for the Complainant this July 27, 2017, by electronic mail:

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/s/ Michael D. Dortch

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in

Case No(s). 16-2419-GA-CSS

Summary: Motion Orwell-Trumbull Pipeline Company, LLC's Unopposed Motion for an Extension of Time To File Its Reply to Orwell natural Gas Company's Memorandum Contra. electronically filed by Mr. Justin M Dortch on behalf of Orwell-Trumbull Pipeline Company, LLC