BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Cynthia Wingo,)
Complainant,)
v.)
Nationwide Energy Partners, LLC,)
Respondent.)

Case No. 16-2401-EL-CSS

NATIONWIDE ENERGY PARTNERS, LLC'S MOTION FOR EXTENSION OF TIME AND REQUEST FOR EXPEDITED RULING

Pursuant to Rules 4901-1-12(C) and 4901-1-13 of the Ohio Administrative Code, Nationwide Energy Partners, LLC respectfully moves for an expedited ruling granting an extension of seven (7) days to file its Reply to the October 10, 2017 Memorandum Contra of the Complainant. Good cause exists for granting the extension of time as counsel for the Respondent will be out of state prior to the current due date of October 17, 2017, and additional time is needed to prepare the Reply. The undersigned certifies that all counsel of record for other parties have been notified of this request and none oppose or object to either the requested seven (7) day extension or the issuance of an expedited ruling.

WHEREFORE, Nationwide Energy Partners, LLC respectfully requests that the Attorney Examiner issue an expedited ruling granting the Motion for an Extension, and establishing the due date of Tuesday, October 24, 2017, for filing a Reply to the Complainant's Memorandum Contra. Respectfully submitted,

/s/ Michael J. Settineri

Michael J. Settineri (0073369), Counsel of Record Stephen M. Howard (0022421) Gretchen L. Petrucci (0046608) Vorys, Sater, Seymour and Pease LLP 52 E. Gay Street, P.O. Box 1008 Columbus, Ohio 43216-1008 614-464-5462 mjsettineri@vorys.com smhoward@vorys.com glpetrucci@vorys.com

Attorneys for Nationwide Energy Partners, LLC

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MEMORANDUM IN SUPPORT

Nationwide Energy Partners, LLC filed an Amended Motion to Dismiss the Complaint for Lack of Jurisdiction on September 29, 2017. The Complainant filed a Memorandum Contra Motion to Dismiss on October 10, 2017. Currently, Nationwide Energy Partners, LLC's Reply would be due on October 17, 2017.

Counsel is scheduled to be out of town prior to the current due date for the Reply. Additional time is needed to prepare the Reply. All other counsel of record in this case has been notified of this request, and none oppose or object to the requested extension of seven (7) days or the issuance of an expedited ruling. Good cause exists for granting on an expedited basis the requested extension so that the Reply would be due for filing on Tuesday, October 24, 2017.

Respectfully submitted,

/s/ Michael J. Settineri Michael J. Settineri (0073369), Counsel of Record Stephen M. Howard (0022421) Gretchen L. Petrucci (0046608) Vorys, Sater, Seymour and Pease LLP 52 E. Gay Street, P.O. Box 1008 Columbus, Ohio 43216-1008 614-464-5462 mjsettineri@vorys.com smhoward@vorys.com glpetrucci@vorys.com

Attorneys for Nationwide Energy Partners, LLC

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 11th day of October, 2017 upon all persons/entities listed below:

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Case No(s). 16-2401-EL-CSS

Summary: Motion for Extension of Time and Request for Expedited Ruling electronically filed by Mr. Michael J. Settineri on behalf of Nationwide Energy Partners, LLC