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December 21, 2018

Ms. Barcy McNeal, Secretary Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215

Re: In the Matter of the Complaint of Interstate Gas Supply, Inc. d/b/a IGS Energy v. Titan Gas LLC d/b/a Titan Gas & Power / Case No. 17-2452-GE-CSS

Dear Ms. McNeal:

Please be advised that Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") and Titan Gas LLC ("Titan") have reached an agreement to resolve the complaint filed in the above-captioned matter. Accordingly, IGS and Titan jointly move for entry of an order dismissing this matter with prejudice.

Please contact me if you have any questions.

Very truly yours,

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Michael Nugent Regulatory Counsel Interstate Gas Supply, Inc. 6100 Emerald Parkway Dublin, Ohio 43016

## **BEFORE** THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Interstate	)
Gas Supply, Inc. d/b/a IGS Energy	)
Complainant,	)
v.	)
Titan Gas LLC d/b/a Titan Gas & Power	)
Respondent.	)

Case No. 17-2452-GE-CSS

## JOINT MOTION TO DISMISS

Now comes Complainant, jointly with Respondent, and respectfully moves the Public Utilities Commission of Ohio ("Commission") to dismiss the above-captioned matter, with prejudice, for the reasons stated below.

Complainant and Respondent have reached an agreement to resolve a complaint filed with the Public Utilities Commission of Ohio concerning alleging misconduct by door-to-door sales agents used by third party vendors to solicit sales on Respondent's behalf.

Prior to the complaint's filing, Respondent had voluntarily terminated its third party sales vendors and suspended third party sales channels in Ohio for violating its Code of Conduct. As a part of the settlement agreement, Respondent will:

- Continue its voluntary suspension of residential sales channels in Ohio for a total • period of twenty-four (24) months and not recommence residential sales until the Commission Staff has reviewed Respondent's compliance and quality assurance procedures;
- Compensate Complainant for any customers that may have been enrolled with • Respondent by the sales agents responsible for violating Respondent's Code of Conduct: and
- Waive termination fees for customers that may have been enrolled with Respondent . by sales agents responsible for violating its Code of Conduct.

Complainant and Respondent have reached a total settlement of the matters raised in the Complaint, and as a result, there is no further controversy pending in this matter. Accordingly the parties move the Commission to dismiss this matter with prejudice.

Respectfully submitted,

INTERSTATE GAS SUPPLY, INC. D/B/A IGS ENERGY

<u>/s/ Michael Nugent</u> Michael Nugent (0090408) Email: <u>mnugent@igsenergy.com</u> Joseph Oliker (0086088) Email: joliker@igsenergy.com Interstate Gas Supply, Inc. 6100 Emerald Parkway Dublin, Ohio 43016 Telephone: (614) 659-5065 Facsimile: (614) 659-5073 Attorneys for Complainant

TITAN GAS LLC D/B/A TITAN GAS & POWER

<u>/s/ Dylan F. Borchers</u> Dylan F. Borchers Dane Stinson BRICKER & ECKLER LLP 100 South Third Street Columbus, OH 43215-4291 Telephone: 614-227-2300 Facsimile: 614-227-2390 E-mail: dborchers@bricker.com dstinson@bricker.com *Attorneys for Respondent* 

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Joint Motion to Dismiss* was served upon the following parties of record this 21st day of December 2018, via electronic transmission, hand-delivery or first-class U.S. mail, postage prepaid.

/s/ Michael Nugent

Michael Nugent

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Case No(s). 17-2452-GE-CSS

Summary: Motion Joint Motion to Dismiss Complaint of Interstate Gas Supply, Inc. electronically filed by Mr. Michael A Nugent on behalf of Interstate Gas Supply, Inc.