

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power & Light Company for)	Case No. 16-0395-EL-SSO
Approval of Its Electric Security Plan.)	

In the Matter of the Application of The)	
Dayton Power & Light Company for)	Case No. 16-0396-EL-ATA
Approval of Revised Tariffs.)	

In the Matter of the Application of The)	
Dayton Power & Light Company for)	
Approval of Certain Accounting)	Case No. 16-0397-EL-AAM
Authority Pursuant to Ohio Rev. Code)	
§ 4905.13.)	

**MOTION TO MODIFY PROCEDURAL SCHEDULE AND MEMORANDUM IN
SUPPORT
OF INTERSTATE GAS SUPPLY, INC.**

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January 10, 2019

**BEFORE
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Approval of Certain Accounting)	Case No. 16-0397-EL-AAM
Authority Pursuant to Ohio Rev. Code)	
§ 4905.13.)	

MOTION TO MODIFY PROCEDURAL SCHEDULE

On December 6, 2018, the Attorney Examiner authorized a procedural schedule in the above referenced matters. Due to extensions during the holidays granted by Interstate Gas Supply Inc. ("IGS") to The Dayton Power and Light Company ("DP&L") to respond to discovery, pursuant to Ohio Adm. Code 4901-1-12(A), IGS hereby moves to modify the procedural schedule. To ensure that IGS may adequately prepare for trial, IGS proposes that the Commission authorize the following revised procedural schedule:

- IGS testimony: February 12, 2019
- Discovery cut-off (for paper discovery other than notices of depositions):
February 19, 2019
- Hearing commences: March 26, 2019

For the reasons set forth in the attached memorandum in support, IGS requests that the Public Utilities Commission of Ohio ("Commission") grant this motion. DP&L does not oppose this motion.

Respectfully submitted,

/s/ Joseph Olikier

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MEMORANDUM IN SUPPORT

On December 6, 2018, the Attorney Examiner issued an entry establishing a procedural schedule in the above referenced matters. Specifically, the Attorney Examiner set forth the following schedule:

- IGS testimony: January 28, 2019
- Hearing resumes (for one witness): February 1, 2019
- Discovery cut-off (for paper discovery other than notices of depositions):
February 4, 2019
- Hearing resumes: February 26, 2019

IGS then served discovery upon DP&L. Subsequently, to accommodate holiday schedules, DP&L requested and received two extensions to respond IGS' discovery. Due to these delays, IGS moves to modify the procedural schedule. To ensure that IGS may properly prepare for trial, IGS proposes to extend the deadline for discovery and

testimony by 15 days. However, given additional conflicts identified in February and March, it is necessary to further extend the date for the hearing in this matter. Accordingly, IGS proposes to set forth the following schedule, which is acceptable to DP&L:

- IGS testimony: February 12, 2019
- Discovery cut-off (for paper discovery other than notices of depositions):
February 19, 2019
- Hearing commences: March 26, 2019

This revised schedule will obviate the need to break the trial into two parts, as was the case under the prior schedule.

Therefore, IGS respectfully requests that the Commission grant this motion and modify the procedural schedule for this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this *Motion to Modify Procedural Schedule and Memorandum in Support of Interstate Gas Supply, Inc.* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 10th day of January 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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/s/ Joseph Olikier

Joseph Olikier

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in

Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Motion to Modify Procedural Schedule and Memorandum in Support electronically filed by Mr. Evan F Betterton on behalf of IGS Energy