BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the Motion to Modify the |) | |
|---|---|-------------------------|
| Exemption Granted to The East Ohio Gas |) | Case No. 18-1419-GA-EXM |
| Company d/b/a Dominion Energy Ohio. |) | |

JOINT MOTION FOR A CONTINUANCE AND REQUEST FOR EXPEDITED RULING

Pursuant to Rule 4901-1-13, Ohio Administrative Code, the Retail Energy Supply Association, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, Interstate Gas Supply, Inc. and Dominion Energy Solutions, Inc ("the Joint Movants") respectfully ask the Commission for a short continuance of the procedural schedule as follows:

- Continue the deadline for the filing of direct testimony from November 1 to November 15, 2019; and
- Call the evidentiary hearing on November 5 as scheduled, but continue the hearing from November 12 to December 3, 2019.

Good cause exists for granting an approximately two-week continuance and for granting it in an expedited manner because the parties have had multiple meaningful conversations in an effort to resolve the issues in this matter, while at the same time preparing and filing initial comments, reply comments and memorandum contra. The Joint Movants would like sufficient time to prepare a stipulation for consideration and hold further conversations without proceeding with litigation preparation. The Joint Movants also would like to avoid filing multiple sets of testimony (some that could be mooted) if a stipulation is presented in this matter.

WHEREFORE, the Retail Energy Supply Association, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, Interstate Gas Supply, Inc. and Dominion Energy

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Solutions, Inc. respectfully request that the Commission grant, on an expedited basis, this request for an approximately two-week continuance of the procedural schedule in this case. Pursuant to Rule 4901-1-12(C), Ohio Administrative Code, counsel for RESA contacted the other parties in this matter regarding the extension request and expedited ruling request. The Staff of the Public Utilities Commission of Ohio and The East Ohio Gas Company d/b/a Dominion East Ohio do not oppose the sought extension or an expedited ruling. OPAE does not object to an expedited ruling, but objects to the extension. OCC opposes both requests.

Respectfully submitted,

/s/ Madeline Fleischer per authorization

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MEMORANDUM IN SUPPORT OF THE JOINT MOTION FOR A CONTINUANCE AND REQUEST FOR EXPEDITED RULING

All parties in this proceeding have proceeded under the schedule in this proceeding, most recently filing reply comments and memorandum contra last Friday. In addition, the parties have proceeded with multiple, meaningful settlement discussions. The parties, however, are now facing a testimony deadline of November 1 and a hearing start date of November 12. Preparing testimony and preparing for trial (including depositions) will leave the Joint Movants with little to no time to continue settlement discussions, Thus, given that meaningful discussions have been had on settlement, the Joint Movants seek an approximately two-week extension of the deadline for filing testimony and the start of the hearing to allow for the preparation and consideration of a settlement document. The Joint Movants would like to proceed in this manner without preparing and filing testimony that could be moot if a settlement agreement is presented.

The Joint Movants submit that a two-week continuance is reasonable. The requested continuance will not unjustly or unduly delay the proceedings or a Commission decision, and no harm will result. The continuance, however, could result in a resolution (in full or in part) of the issues, which could streamline this proceeding. Accordingly, the Joint Movants submit that good cause exists for extending the procedural schedule by two weeks.

Additionally, the Joint Movants request an expedited ruling on this motion so that all parties are promptly and adequately informed of the ruling prior to the November 1 deadline for filing testimony. Pursuant to Rule 4901-1-12(C), Ohio Administrative Code, counsel for RESA contacted the other parties in this matter regarding the extension request and the expedited ruling request. The Staff of the Public Utilities Commission of Ohio and The East Ohio Gas Company d/b/a Dominion East Ohio do not oppose the sought extension or an expedited ruling. OPAE does not object to an expedited ruling, but objects to the extension. OCC opposes both requests.

WHEREFORE, the Retail Energy Supply Association, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, Interstate Gas Supply, Inc. and Dominion Energy Solutions, Inc. respectfully request that the Commission grant their Joint Motion for an approximately two-week continuance of the deadlines for testimony and the hearing as outlined above.

Respectfully submitted,

/s/ Madeline Fleischer per authorization

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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, I certify that a copy of the foregoing document will be served via electronic mail on all parties listed below this 30th day of October 2019.

/s/ Gretchen L. Petrucci Gretchen L. Petrucci

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Summary: Motion Joint Motion for a Continuance and Request for Expedited Ruling electronically filed by Mrs. Gretchen L. Petrucci on behalf of Retail Energy Supply Association and Direct Energy Business Marketing LLC and Direct Energy Services LLC and Interstate Gas Supply, Inc. and Dominion Energy Solutions, Inc.