

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. )

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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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**Case No(s). 18-1419-GA-EXM**

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.