

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|--------------------------------------|---|-------------------------|
| In the Matter of the Complaint and |) | |
| Investigation of Staff of the Public |) | |
| Utilities Commission of Ohio, |) | |
| |) | |
| Complainant, |) | Case No. 19-1582-TP-COC |
| |) | |
| v. |) | |
| |) | |
| Frontier North Inc., |) | |
| |) | |
| Respondent. |) | |

**FRONTIER NORTH INC.’S UNOPPOSED MOTION TO EXTEND PROCEDURAL
SCHEDULE
AND
REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Administrative Code 4901-1-13, Frontier North Inc. (“Frontier”) moves for a ninety-day extension of all remaining deadlines in the scheduling order filed on March 6, 2020. Specifically, Frontier requests ninety-day extensions on the following deadlines: Stipulations, pre-filed Testimony, telephonic prehearing conference and hearing date. The Staff of the Public Utilities Commission of Ohio (“Staff”) and the Office of the Ohio Consumers’ Counsel (“OCC”) do not oppose the extension of ninety days of these deadlines.

Good cause exists to grant the requested extension as Frontier is focused on efforts to ensure that it is able to operate and provide essential communications while balancing the need to allow employees to meet the requirements for social distancing and the challenges that all businesses are seeing during this National and Ohio declared State of Emergency.

The reasons for this request are set forth more fully in the accompanying memorandum in support. In addition, because any Stipulation is currently due on March 25, 2020, Frontier requests

an expedited ruling on this Motion, under Ohio Adm. Code 4901-1-12(C). Frontier contacted the Staff and the OCC, and no party objects to an expedited ruling.

Respectfully submitted,

/s/ Michele Noble

Michele L. Noble (0072756)
SQUIRE PATTON BOGGS (US) LLP
41 S. High Street, Suite 2000
Columbus, OH 43215
Telephone: (614) 365-2700
Facsimile: (614) 365-2499
Michele.noble@squirepb.com
(willing to accept service by e-mail)

Counsel for Frontier North Inc.

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|--------------------------------------|---|-------------------------|
| In the Matter of the Complaint and |) | |
| Investigation of Staff of the Public |) | |
| Utilities Commission of Ohio, |) | |
| |) | |
| Complainant, |) | Case No. 19-1582-TP-COC |
| |) | |
| v. |) | |
| |) | |
| Frontier North Inc., |) | |
| |) | |
| Respondent. |) | |

MEMORANDUM IN SUPPORT

On January 14, 2020, the attorney examiner issued a procedural schedule for this case, which was amended on March 6, 2020. The current procedural schedule requires that any settlement agreement be filed by March 25, 2020 and requires testimony to be filed by April 15, 2020. The attorney examiner also ordered that a hearing be held in this proceeding a week later on April 23, 2020.

On March 9, 2020, the Governor of the State of Ohio declared a State of Emergency with Executive Order 2020-01D to protect the well-being of Ohio citizens from the dangerous effects of COVID-19.¹ Under Ohio Adm. Code 4901-1-13(A) extensions of time “may be granted upon motion of any party for good cause shown.” There is good cause to extend the remaining deadlines to allow Frontier to focus efforts on operations and providing essential communications, and while balancing the need to allow employees to meet the requirements for social distancing and address the challenges that the current situation has presented.

¹ March 9, 2020 Executive Order, 2020-01D, available at [http: coronavirus.ohio.gov](http://coronavirus.ohio.gov)

Frontier, Staff and the OCC have been actively engaged in settlement discussions, in order to resolve this matter and present the Commission with an agreed Stipulation for its consideration. Frontier will continue to work toward reaching a settlement in this case. Counsel for Staff and the OCC do not oppose this Motion, and do not oppose an expedited ruling.

For these reasons, Frontier respectfully requests that the Commission grant the Motion to Extend the Procedural Schedule, moving all remaining deadlines by ninety days.

Respectfully submitted,

/s/ Michele Noble

Michele L. Noble (0072756)
SQUIRE PATTON BOGGS (US) LLP
41 S. High Street, Suite 2000
Columbus, OH 43215
Telephone: (614) 365-2700
Facsimile: (614) 365-2499
Michele.noble@squirepb.com
(willing to accept service by e-mail)

Counsel for Frontier North Inc.

Dated: March 23, 2020

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing was sent by electronic means on the
23rd day of March 2020:

Angela D. O'Brien (0097579)
Counsel of Record
David Bergman (0009991)
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, OH 43215
Telephone [O'Brien]: (614) 466-9531
Telephone [Bergmann] (614) 466-9569
angela.obrien@occ.ohio.gov
david.bergmann@occ.ohio.gov
(willing to accept service by e-mail)

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 N. High Street
Columbus, Ohio 43215
Telephone: (614) 365-4124
bojko@carpenterlipps.com
(willing to accept service by e-mail)

Robert Eubanks
Andrew B. Shaffer
Assistant Attorneys General
Public Utilities Section
30 East Broad St, 16th Floor
Columbus, OH 43215
Andrew.shaffer@ohioattorneygeneral.gov
Robert.eubanks@ohioattorneygeneral.gov

/s/ Michele Noble
Michele L. Noble

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/23/2020 3:01:09 PM

in

Case No(s). 19-1582-TP-COC

Summary: Motion to Extend Schedule electronically filed by Michele L Noble on behalf of Frontier North Inc.