BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter of The Regulation of : Case Nos. 20-209-GA-GCR The Purchased Gas Adjustment : 20-309-GA-UEX Clauses Contained Within The Rate : 20-409-GA-PIP

Schedules of Northeast Ohio Natural Gas :

Corp. :

UNOPPOSED MOTION FOR THE EXTENSION OF THE DEADLINE FOR FILING THE AUDIT REPORT SUBMITTED ON BEHALF OF THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio ("Staff"), pursuant to Ohio Administrative Code 4901-1-13(A), respectfully requests a thirty-day extension of the November 20, 2020 Audit Report filing deadline for this proceeding. Staff respectfully requests that the deadline be extended to December 20, 2020. Staff also requests that the Commission grant its motion on an expedited basis pursuant to O.A.C. 4901-1-12(C). Staff contacted counsel for Northeast Ohio Natural Gas Corp. ("Northeast" or "the Company") and the Company does not object to this extension. The reasons for this Motion are set forth more fully in the attached memorandum.

Respectfully submitted,

Dave Yost

Ohio Attorney General

John H. Jones

Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren

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On Behalf of the Staff of Public Utilities Commission of Ohio

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MEMORANDUM IN SUPPORT

By entry dated January 29, 2020, the Commission directed Staff to file its GCR audit report at least sixty days before the hearing date of January 21, 2021. Due to the timing of the filing of the company's final GCR report, which is not expected until early December, Staff needs additional time to file the Audit Report in this proceeding. Staff respectfully requests that the deadline be moved thirty days to December 20, 2020. Staff also requests that the Commission grant its motion on an expedited basis pursuant to O.A.C. 4901-1-12(C). Staff contacted counsel for Northeast and the Company does not object to the extension.

It is for good cause shown, as explained in this Memorandum, that Staff respectfully requests that the Commission grant this Motion.

Respectfully submitted,

Dave Yost

Ohio Attorney General

John H. Jones

Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren

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On Behalf of the Staff of Public Utilities Commission of Ohio

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Foregoing **Unopposed Motion for Extension**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following parties of record, this 2nd day of November, 2020.

/s/ Thomas G. Lindgren

Thomas G. LindgrenAssistant Attorney General

PARTIES OF RECORD:

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Case No(s). 20-0209-GA-GCR, 20-0309-GA-UEX, 20-0409-GA-PIP

Summary: Motion Unopposed Motion for the Extension of the Deadline for Filing The Audit Report Submitted on Behalf of The Staff of The Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO