### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

34-GA-ALT
3

# MOTION FOR EXTENSION OF TIME FOR DOMINION ENERGY OHIO'S RFP AUDIT DEADLINES

Pursuant to Ohio Administrative Code Rule 4901-1-13(A), Staff of the Public Utilities Commission of Ohio move for an extension of the upcoming PIR Audit deadlines in this case. In its January 11, 2023 entry in this case, the PUCO set the following deadlines: a draft audit report be submitted June 1, 2023; a factual review due to auditor by June 15, 2023; and a final audit report presented to Staff/filed June 30, 2023. For the reasons set forth in the attached memorandum, Staff requests that the deadlines be extended to June 14, 2023 at noon, June 28, 2023, and July 17, 2023, respectively.

Respectfully submitted,

# **Dave Yost**

Ohio Attorney General

## **John Jones**

**Section Chief** 

# /s/ Shaun Lyons

# **Shaun Lyons**

Assistant Attorney General Public Utilities Section 30 East Broad Street, 26<sup>th</sup> Floor Columbus, OH 43215

Telephone: 614.728.8673 Fax: 866.372.7128

Shaun.Lyons@OhioAGO.gov

# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the	)	
East Ohio Gas Company d/b/a Dominion	)	Case No: 20-1634-GA-ALT
Energy Ohio for Approval of an	)	
Alternative Form of Regulation to	)	
Continue Its Pipeline Infrastructure	)	
Replacement Program		

#### MEMORANDUM IN SUPPORT

Staff respectfully requests that the deadlines referenced above be extended for good cause shown, namely that there was an administrative delay in beginning the audit, and that an extension of approximately two weeks is appropriate. By entry dated January 11, 2023, the PUCO selected Daymark Energy Advisors (Daymark) to perform the audit consulting services in accordance with the RFP in this case, with an initial deadline of June 1. Due to an administrative delay in beginning the audit, Staff and Daymark need additional time to file the audit report in this proceeding. The PUCO initially set the following deadlines: a draft audit report be submitted June 1, 2023; a factual review due to auditor by June 15, 2023; and a final audit report presented to Staff/filed June 30, 2023. For the reasons set forth in the attached memorandum, Staff requests that the deadlines be extended to June 14, 2023 at noon, June 28, 2023, and July 17, 2023, respectively. Staff also contacted counsel for Dominion Energy Ohio, and the intervening parties on the Monday prior to this filing and did not receive any opposition. Accordingly, Staff respectfully requests an extension as described above.

Respectfully submitted,

#### **Dave Yost**

Ohio Attorney General

## **John Jones**

**Section Chief** 

# /s/ Shaun Lyons

# **Shaun Lyons**

Assistant Attorney General Public Utilities Section 30 East Broad Street, 26<sup>th</sup> Floor Columbus, OH 43215 Telephone: 614.728.8673

Fax: 866.372.7128

Shaun.Lyons@OhioAGO.gov

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing **Motion for Extension of Time for Dominion Energy Ohio's RFP Audit Deadlines** was served by electronic mail to the following parties of record, this 19<sup>th</sup> day of April, 2023.

#### /s/ Shaun Lyons

### **Shaun Lyons**

**Assistant Attorney General** 

#### **PARTIES OF RECORD:**

Christopher T. Kennedy Mark A. Whitt Whitt Sturtevant LLP 88 East Broad Street, Suite 1590 Columbus, Ohio 43215

<u>kennedy@whitt-sturtevant.com</u> whitt@whitt-sturtevant.com

Andrew J. Campbell (0081485)

Dominion Energy, Inc.
21 East State Street, Suite 911
Columbus, Ohio 43215
andrew.j.campbell@dominionenergy.com
Counsel for the East Ohio Gas Company
D/B/A Dominion Energy Ohio

#### **Robert Dove**

Kegler Brown Hill + Ritter Co., L.P.A. 65 E State St., Ste. 1800 Columbus, OH 432115-4295 rdove@keglerbrown.com Office: 614-462-5443 **Bruce Weston** 

Ohio Consumers' Counsel

John Finnigan

Counsel of Record Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, Suite 700 Columbus, Ohio 43215 Telephone: Finnigan (614) 466-9585 john.finnigan@occ.ohio.gov

Counsel for the Office of the Ohio Consumers' Counsel

#### David F. Proaño

Counsel of Record BAKER & HOSTETLER LLP 127 Public Square, Suite 2000 Cleveland, Ohio 44114 216-621-0200 / Fax 216-696-0740 dproano@bakerlaw.com

#### David C. Rinebolt

Ohio Partners for Affordable Energy PO Box 1793 Findlay, OH 45849-1793 Office: 614-975-8692

drinebolt@opae.org

Counsel for Ohio Partners for Affordable Energy Ali I. Haque Erika D. Prouty Paul M. M. Willison BAKER & HOSTETLER LLP

200 Civic Center Drive, Suite 1200 Columbus, OH 43215 614-462-2605 / Fax 614-462-2616 ahaque@bakerlaw.com
eprouty@bakerlaw.com
pwillison@bakerlaw.com

Counsel for Ohio Energy Leadership Council, Formerly Known as Industrial Energy Users-Ohio

# This foregoing document was electronically filed with the Public Utilities Commission of Ohio Docketing Information System on

5/19/2023 1:30:05 PM

in

Case No(s). 20-1634-GA-ALT

Summary: Motion for Extension of Time for Dominion Energy Ohio's RFP Audit Deadlines and Memorandum in Support electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO.