

FILE

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV

2004 OCT -6 AM 12:33

In the Matter of the Application of)
Northeast Ohio Natural Gas Corp. for)
an Increase in its Rates and Charges for)
Natural Gas Service.)

Case No. 03-2170-GA-AIR

PUCO

In the Matter of the Application of)
Northeast Ohio Natural Gas Corp. for)
Approval of an Uncollectible Expense)
Rider.)

Case No. 04-964-GA-UEX

**MOTION FOR A CONTINUANCE OF HEARING DATE
OF PUBLIC UTILITIES COMMISSION OF OHIO STAFF**

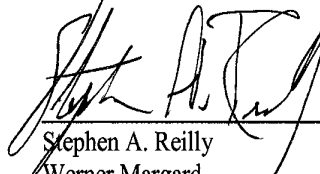
The Public Utilities Commission of Ohio Staff moves for a continuance of the hearing currently scheduled for October 12, 2004 until October 21, 2004. Staff spent its resources attempting to resolve issues with the company through negotiations and it only recently became apparent that Staff testimony might be needed. Hence, Staff needs this brief continuance to finish preparing written testimony in this matter as described in more detail in the accompanying memorandum.

Staff also moves for an expedited ruling because the hearing date will arrive soon. Staff contacted the other parties. The Office of Consumers' Council and The Timken Company do not

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object to a decision without memorandum. The company stated it intended to file a memorandum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. A. Reilly', is written over a horizontal line.

Stephen A. Reilly
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MEMORANDUM IN SUPPORT

Staff believes that agreement is the best way to resolve the issues in this case where that is possible. This is because of the development and understanding of positions and data that has attended the discussions in this case, particularly between Staff and the company. To state the obvious - greater understanding of issues and the generation of more complete data on which to base decisions lead only to better recommendations and better decision-making. This benefits the Commission and the parties.

Staff put its efforts into the search for agreement rather than litigation because of those benefits. In so doing, it resolved many issues with the Company and it continues to attempt to resolve all issues. It believes some of these resolutions may also address, at least, some of the concerns voiced by the Office of Consumers' Council and The Timken Company, the only other parties. But, this case involves many issues. The Company raised 16 objections to the Staff Report, some with multiple parts. OCC raised three objections and Timken raised five objections. The time Staff had to work on them was not endless. Staff's efforts have been fruitful but they have not resulted in a complete resolution of this matter yet.

Because issues remain, the hearing scheduled for next Tuesday, October 12, 2004 poses a problem for Staff. Staff cannot draft testimony that is as complete and as valuable to the Commission as it might be because of the short time. Such testimony will require a continuance of the hearing to provide the Staff with the needed time.

Staff does not seek a lengthy delay. It only seeks until October 21, 2004 – a little over a one-week delay. Staff does not know of any reason that brief delay should preju-

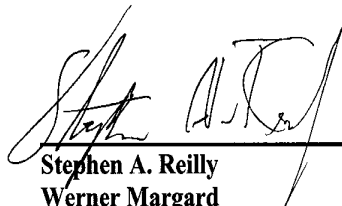
dice any party. It will benefit the Commission through the improved testimony it allows.

Accordingly, Staff moves to continue this case until October 21, 2004.

Because the hearing is next week, Staff also moves for an expedited decision. Neither OCC nor Timken object to such a decision. The Company stated it intended to file a memorandum contra. Nevertheless, Staff requests an expedited decision to prevent its continuance motion from becoming moot due to the passage of time. Such a result, in effect, is a denial of the motion for a continuance. Staff believes such a denial is not in the best interests of the Commission or the parties to this case as it has already discussed.

Accordingly, Staff requests an expedited ruling granting its motion for a continuance.

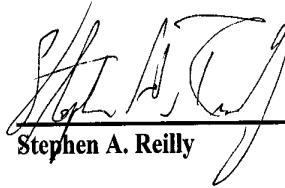
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Continuance of Hearing Date submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served via electronic transmission, regular U.S. mail, postage prepaid, or hand-delivered, upon the following parties of record, this 6th day of October, 2004.



Stephen A. Reilly

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