BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation. | )))) | Case No. 11-5515-GA-ALT  |

**MOTION FOR EXTENSION OF TIME**

 On May 8, 2012, Columbia Gas of Ohio, Inc. (Columbia) filed an application requesting authority to continue the infrastructure replacement program (IRP) portion of its alternative rate plan for an additional five years. Under the current procedural schedule, comments on Columbia’s application are due on August 31, 2012, and reply comments are due on September 11, 2012.

The Staff hereby requests that the due date for the comments be extended to September 14, 2012 and that the due date for reply comments be extended to September 25, 2012. Staff also requests expedited consideration of this motion. The reasons for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

**Michael DeWine**

Attorney General

**William L. Wright**

Section Chief

*/s/Thomas G. Lindgren*

**Thomas G. Lindgren**

Assistant Attorney General

Public Utilities Commission of Ohio

180 East Broad Street, 6th Floor

Columbus, Ohio 43215

(614) 466-4395

FAX: (614) 644-8768

thomas.lindgren@puc.state.oh.us

**MEMORANDUM IN SUPPORT**

 The parties to this proceeding have met several times in recent weeks and have made significant progress toward a resolution of the issues. Staff believes that a settlement is possible if the parties are granted additional time to continue discussions. Accordingly, the Staff requests an extension of time until September 14, 2012 for Staff and other parties to submit comments, and to September 25 for the filing of reply comments. All parties have agreed that they will not oppose this request.

Respectfully submitted,

**Michael DeWine**

Attorney General

**William L. Wright**

Section Chief

 */s/Thomas G. Lindgren*

**Thomas G. Lindgren**

Assistant Attorney General

Public Utilities Section

180 East Broad Street, 6th Floor

Columbus, Ohio 43215

Telephone: (614) 466-4395

Fax: (614) 644-8764

thomas.lindgren@puc.state.oh.us

**CERTIFICATE OF SERVICE**

 I hereby certify that a true copy of the foregoing **Motion for Extension of Time** was served by electronic mail upon all parties of record, this 30th day of August, 2012.

/s/Thomas G. Lindgren

**Thomas G. Lindgren**

 Assistant Attorney General

**Parties of Record:**

|  |  |
| --- | --- |
| Stephen B. SeipleBrooke E. LeslieColumbia Gas of Ohio, Inc.200 Civic Center DriveP.O. Box 117Columbus, Ohio 43216sseiple@nisource.combieslie@nisource.com**On Behalf of Columbia Gas of Ohio, Inc.**Bruce J. WestonOhio Consumers’ CounselLarry S. SauerJoseph P. SerioOffice of the Ohio Consumers’ Counsel10 West Broad Street, Suite 1800Columbus, Ohio 43215sauer@occ.state.oh.usserio@occ.state.oh.us**On Behalf of the Office of the Ohio Consumers’ Counsel**Chad A. EndsleyOhio Farm Bureau Federation280 North high StreetP.O. Box 182383Columbus, Ohio 43218-2383cendsley@ofbf.org**On Behalf of the Ohio Farm Bureau Federation** | Colleen L. MooneyOhio Partners for Affordable Energy231 West Lima StreetP.O. Box 1793Findlay, Ohio 45839cmooney2@columbus.rr.com**On Behalf of Ohio Partners for Affordable Energy**M. Anthony LongSenior Assistant CounselHonda of America Mfg., Inc.24000 Honda ParkwayMarysville, Ohio 43040tony\_long@ham.honda.com**On Behalf of Honda of America Mfg., Inc.** |