**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| --- | --- | --- |
| In the Matter of the Commission’s Review of The Alternative Rate Plan and Exemption Rules Contained in Chapter 4901:1-19 of the Ohio Administrative Code. | )  )  )  )  ) | Case No. 11-5590-GA-ORD |

**MOTION FOR AN EXTENSION OF TIME**

**TO FILE COMMENTS**

**BY COLUMBIA GAS OF OHIO, INC. AND**

**THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

Pursuant to 4901-1-13 (A) of the Ohio Administrative Code, Columbia Gas of Ohio, Inc., (“Columbia”) and The East Ohio Gas Company d/b/a Dominion East Ohio (“Dominion”) (collectively, “Companies”) respectfully request a thirty-day extension in which to file comments in the above-captioned matter. The reasons for this request are more fully set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Brooke E. Leslie

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**THE EAST OHIO GAS COMPANY D/BA/ DOMINION EAST OHIO**

**MEMORANDUM IN SUPPORT**

By entry dated November 22, 2011, the Public Utilities Commission of Ohio (“Commission”) proposed amendments to Chapter 4901:1-19, Ohio Adm. Code, pursuant to Section 119.032, Revised Code. The Commission’s entry allows for any interested person or entity to file comments by December 22, 2011, and reply comments by January 23, 2012.

The Companies believe an extension of time is necessary for several reasons. First, the proposed changes to OAC 4901:1-19 are expansive and involve a number of new, complex proposals including a procedure for exiting the merchant function. More time is needed to fully analyze the proposed changes which have the potential to significantly impact the way regulated gas utilities do business. These rule changes require considerable attention and careful forethought.

Further, the red-lined version of the proposed rule changes posted on the Commission’s website is not a comprehensive depiction of all the changes proposed. More time is needed to fully assess what provisions have been deleted, added or simply renumbered.

Finally, the timing of the Entry, Thanksgiving and the upcoming holiday season substantially hinders the Companies’ ability to file comments in the time allotted. Many employees typically take vacation in December to spend time with family which also hampers the Companies’ ability to respond meaningfully to the Commission’s proposed rules. Therefore, the Companies request an additional thirty days in which to file comments to the proposed rule changes.

Additionally, the Companies respectfully request that the Commission schedule a technical conference to clarify the proposed changes and to help the Companies gain a better understanding of the reasoning behind the proposed changes.

**WHEREFORE,** the Companies respectfully request a thirty-day extension in which to file comments in the instant proceeding and further request a technical conference.

Respectfully submitted,

/s/ Brooke E. Leslie

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