FILE

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

2008 JUL 23 PM 3: 44

In the Matter of the Commission's)	
Review of Chapters 4901:1-17 and 4901:1-18)	Case No. 08-723-AU-ORI
and Rules 4901:1-5-07, 4901:1-10-22,)	
4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and)	
4901:1-29-12 of the Ohio Administrative Code.)	

MOTION OF THE OHIO GAS ASSOCIATION FOR AN EXTENSION OF TIME

Pursuant to Ohio Administrative Code (O.A.C.) Section 4901-1-13, the Ohio Gas Association ("OGA") requests that the Commission issue an Order granting its members a 30-day extension of time for filing initial and reply comments as well as for the responses requested by the Commission, in the above-referenced case for good cause shown. Specifically, the initial and reply comment deadlines would be extended from August 11, 2008 and September 12, 2008, to September 10, 2008 and October 12, 2008, respectively. The reasons supporting this request are set forth in the attached Memorandum in Support, incorporated herein by reference.

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Respectfully submitted,

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)	
Review of Chapters 4901:1-17 and 4901:1-18)	
and Rules 4901:1-5-07, 4901:1-10-22,)	Case No. 08-723-AU-ORD
4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and)	
4901:1-29-12 of the Ohio Administrative Code.)	

MEMORANDUM IN SUPPORT

On June 25, 2008, the Commission issued an Entry seeking comments on the Commission Staff's ("Staff") proposed revisions to the Commission rules, as well as responses to questions posed by the Staff. This Entry established a deadline for initial comments of August 11, 2008 and a deadline of September 12, 2008 for reply comments. The Ohio Gas Association ("OGA") is in the process of reviewing Staff's proposed changes and drafting answers to the ordered responses. However, given the number of significant changes and given the work required to prepare the ordered responses, as well as their complexity, additional time is necessary.

The proposed rules include numerous and significant revisions and additions to the Public Utilities Commission's rules for the establishment of credit for residential service and for termination of residential service. The proposed rules also greatly revise the Percentage of Income Payment Plan (PIPP) program, and propose two new payment programs under Ohio Administrative Code Section 4909:1-18. Similarly, the requested responses are numerous and detailed, and it will require a significant amount of time to craft adequate responses. Given the scope of the ordered responses and the in-depth nature of such questions, the OGA requests that the Commission grant a 30-day extension of the deadlines for both comments and reply comments. The OGA believes that the requested extension is reasonable in light of the current work load of its mem-

bers, the complexity of the required responses, and the time necessary to prepare such requested responses

Wherefore, for the reasons discussed herein, the OGA respectfully requests that the Commission extend the initial comment deadline from August 11, 2008 to September 10, 2008, and the reply comment deadline from September 12, 2008 to October 12, 2008 for good cause shown.

Respectfully submitted,

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