

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia)
Gas of Ohio, Inc. for Approval of a General) Case No. 08-1344-GA-EXM
Exemption of Certain Natural Gas Commodity)
Sales Services or Ancillary Services from)
Chapters 4905, 4909, and 4935 except Sections)
4905.10, 4935.01, and 4935.03, and from)
specified sections of Chapter 4933 of the)
Revised Code.)

**MOTION OF
COLUMBIA GAS OF OHIO, INC.
FOR A WAIVER
TO ESTABLISH A PROPOSED REVISED PROCEDURAL SCHEDULE
AND
MEMORANDUM IN SUPPORT**

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March 9, 2009

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

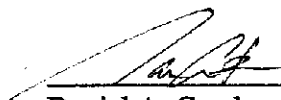
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Now comes Columbia Gas of Ohio, Inc. ("Columbia") and respectfully moves that, pursuant to Rule 4901:1-19-03(C), Ohio Administrative Code, the Public Utilities Commission of Ohio ("Commission") grant a waiver to the provisions of Rules 4901:1-19-04 and 4901:1-19-09, Ohio Adm. Code to establish a proposed revised procedural schedule for this proceeding. The details and reasons for this request are set forth in the attached Memorandum in Support.

Respectfully Submitted,

COLUMBIA GAS OF OHIO, INC.



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MEMORANDUM IN SUPPORT

On January 30, 2009, Columbia filed its Application in this docket and a Motion for Waivers and to Establish a Procedural Schedule and Memorandum in Support. Within that motion, Columbia set forth a schedule to file the proposed tariffs relating to its Application and supporting testimony on March 13, 2009. On February 25, 2009, the Commission issued an Entry finding that the date on which the testimony and tariff documentation is filed should be considered the original filing date of the Application for purposes of the computation of time in accordance with Rule 4901:1-19-06, Ohio Adm. Code.

Rule 4901:1-19-03, Ohio Adm. Code, provides that the Commission may waive any provision in Chapter 4901:1-19, Ohio Adm. Code, for good cause shown. Of the five criteria listed in the rule which may be considered by the Commission in judging good cause, four of them relate only to the nature and amount of information required to be provided with the filing; the fifth criterion permits a consideration of the public interest. Specifically, the waivers sought by Columbia seek relief from certain provisions required by Rules 4901:1-19-04 and 4901:1-19-09, Ohio Adm. Code.

The waivers sought herein relate to the purpose of accommodating the timely implementation of the proposals made in the Application. Due to the significant volume of necessary tariff modifications, and providing support of such modifications through testimony and rationale descriptions, Columbia is not able to complete this undertaking by March 13, 2009.

Accordingly, Columbia proposes the following revised procedural schedule and seeks waivers as follows:

1. Rules 4901:1-19-04 and 4901:1-19-09, Ohio Adm. Code

Columbia seeks waivers from Rules 4901:1-19-04(B)(2), (C)(6) and (7), and 4901:1-19-09(C), (E), and (G), Ohio Adm. Code, which requires the applicant file all testimony supporting the application with the application; provide one scored copy each of all proposed tariff schedules and the underlying rationale thereof; and the establishment of a procedural schedule. As an alternative and responsive to the hearing requirements of Rule 4901:1-19-08, Ohio Adm. Code, Columbia requests that the Commission approve the proposed revised procedural schedule below for its consideration of the Application in this proceeding. Further, Columbia has notified all stakeholders, intervenors and interested parties, prior to the filing of this Motion, of the following proposed revised procedural schedule:

	<u>Due Date</u>
Notice of Intent	December 31, 2008
Application of Columbia Gas of Ohio, Inc.	January 30, 2009
Deadline to File Direct Testimony Supporting Application	March 27, 2009
Deadline to File All Proposed Tariff Schedules	March 27, 2009
Local Hearings	April 6 – 20, 2009

Prehearing Conference and Technical Conference	April 24, 2009
Intervenor Direct Testimony	May 8, 2009
Intervention Deadline	May 8, 2009
Comments Concerning Application	May 12, 2009
Deadline to Serve Discovery ¹	May 26, 2009
Reply Testimony	June 5, 2009
Evidentiary Hearing	June 22, 2009
Post-Hearing Briefs	July 10, 2009
Reply Briefs	July 17, 2009

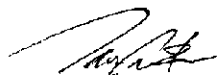
Columbia contends that the proposed revised procedural schedule still provides sufficient time for Commission consideration and approval for the timely implementation of the proposed Standard Sales Offer Service (“SSO”) so that suppliers would have a reasonable opportunity to refill storage with more of their own gas (rather than purchasing gas from Columbia) resulting in maximum utilization of storage which should be reflected in a lower retail price adjustment in the SSO auction.

WHEREFORE, for the reasons and on the basis set forth above, Columbia respectfully requests that the Commission grant the proposed revised procedural schedule requested herein consistent with the discussions above.

¹ Deadline to serve discovery is consistent with 4901:1-19-09(G), Ohio Adm. Code. All parties shall submit responses to any and all discovery within 14 calendar days from the date of service, whether service is accomplished via electronic means or U.S. mail.

Respectfully Submitted,

COLUMBIA GAS OF OHIO, INC.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion of Columbia Gas of Ohio, Inc. For a Waiver to Establish a Proposed Revised Procedural Schedule and Memorandum In Support was served upon all interested persons and parties of record by regular U. S. mail and electronic mail this 9th day of March, 2009.



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