

**FILE**

6

RECEIVED-DOCKETING DIV  
2009 SEP -4 PM 4:07  
PUCO

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Eastern Natural Gas Company, for Approval ) Case No. 08-940-GA-ALT  
of an Alternative Rate Plan Proposing a )  
Revenue Decoupling Mechanism )

In the Matter of the Application of )  
Pike Natural Gas Company, for Approval ) Case No. 08-941-GA-ALT  
of an Alternative Rate Plan Proposing a )  
Revenue Decoupling Mechanism )

---

**MOTION FOR CONTINUANCE OF HEARINGS**

---

Pursuant to Rule 4901-1-13 of the Ohio Administrative Code, Eastern Natural Gas Company and Pike Natural Gas Company respectfully request a continuance of the hearings scheduled in these matters. Good cause exists for this Motion as set forth in the accompanying Memorandum in Support. Neither the Staff, nor the Ohio Consumers' Counsel, nor Ohio Partners for Affordable Energy object to this Motion.

WHEREFORE, Eastern Natural Gas Company and Pike Natural Gas Company request that the hearings scheduled for September 9 and 10 in these matters be continued and a single hearing for both cases be scheduled for Friday, September 18 at 10:00 AM.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician SM Date Processed SEP 04 2009

Respectfully submitted,

By: Stephen M. Howard

M. Howard Petricoff  
Stephen M. Howard  
Attorneys for Eastern Natural Gas Company  
and Pike Natural Gas Company  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
P.O. Box 1008  
Columbus, OH 43215  
614-464-5414  
[mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)

Attorneys for the Applicants

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Eastern Natural Gas Company, for Approval ) Case No. 08-940-GA-ALT  
of an Alternative Rate Plan Proposing a )  
Revenue Decoupling Mechanism )

In the Matter of the Application of )  
Pike Natural Gas Company, for Approval ) Case No. 08-941-GA-ALT  
of an Alternative Rate Plan Proposing a )  
Revenue Decoupling Mechanism )

---

**MEMORANDUM IN SUPPORT**

---

Eastern Natural Gas Company, Pike Natural Gas Company, the Staff, the Office of the Ohio Consumers' Counsel and the Ohio Partners for Affordable Energy have met to resolve the issues in the case. A conceptual agreement has been reached among all parties on all issues in both cases. The parties are now reviewing language to finalize a Joint Stipulation and Recommendation to be filed in these cases.

It is unlikely that the parties will be able to reach a final agreement on language prior to the hearings scheduled for September 9 in Case No. 08-941-GA-ALT and September 10 in Case No. 08-940-GA-ALT.

A continuance of the September 9 and 10 hearings and an extension of nine days should provide sufficient time for the parties to finalize a Joint Stipulation and Recommendation which would resolve all issues in this case.

Good cause exists for granting the request for continuance of the hearings. Neither the Staff nor the Ohio Consumers' Counsel nor Ohio Partners for Affordable Energy object to this motion.

The Applicants respectfully request that the hearings be continued and that a single hearing be scheduled for Friday, September 18 at 10:00 AM.

Respectfully submitted,

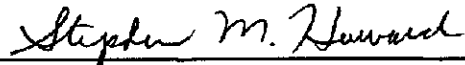
By: Stephen M. Howard

M. Howard Petricoff  
Stephen M. Howard  
Attorneys for Eastern Natural Gas Company  
and Pike Natural Gas Company  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street  
P.O. Box 1008  
Columbus, OH 43215  
614-464-5414  
[mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)

Attorneys for the Applicants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion for Continuance of Hearings was served upon the following parties of record this 4th day of September, 2009, via electronic mail.

  
\_\_\_\_\_  
Stephen M. Howard

David C. Rinebolt  
Colleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
P. O. Box 1793  
Findlay, OH 45839-1793  
drinebolt@aol.com  
cmooney2@columbus.rr.com

Werner Margard, III  
Assistant Attorney General  
Public Utilities Section  
180 East Broad Street, 9<sup>th</sup> Floor  
Columbus, OH 43215  
Werner.margard@puc.state.oh.us

Lawrence Sauer  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215-3485  
sauer@occ.state.oh.us