

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

**In the Matter of Protocols for the
Measurement and Verification of Energy
Efficiency and peak Demand Reduction
Measures.**

Case No. 09-512-GE-UNC

**MOTION FOR EXTENSION AND MEMORANDUM IN SUPPORT OF THE EAST
OHIO GAS COMPANY D/B/A DOMINION EAST OHIO, COLUMBIA GAS OF OHIO,
INC., VECTREN ENERGY DELIVERY OF OHIO, INC., AND DUKE ENERGY OHIO,
INC. (EXPEDITED RULING REQUESTED)**

Pursuant to Rule 4901-1-13, The East Ohio Gas Company d/b/a Dominion East Ohio (“DEO”), Columbia Gas of Ohio, Inc. (“Columbia”), Vectren Energy Delivery of Ohio, Inc. (“VEDO”), and Duke Energy Ohio, Inc. (“DE-Ohio”) (together the “Gas Utilities”) jointly submit this Motion for Extension of Time to extend the deadline for the filing of proposed values and protocols from October 15, 2009 until November 15, 2009.

On June 24, 2008, the Commission issued an Entry setting forth a procedural schedule in this matter. The Commission set the procedural schedule, in part, to permit the electric utilities to use the Technical Reference Manual (“TRM”) to prepare their January 1, 2010 filings of energy efficiency portfolio plans required pursuant to pending Rule 4901:1-39-04. June 24, 2008 Entry at 7. The Commission’s procedural schedule required the gas and electric utilities to file proposed values and protocols by September 15, 2009. June 24, 2008 Entry at 8. Since that time the Commission has granted an extension until October 15, 2009 for the gas and electric utilities to file proposed values and protocols. July 14, 2009 Entry at 2; September 10, 2009 Entry at 2.

The Commission directed that the gas and electric utilities base the proposed values and protocols upon “the proposal set forth in Appendix B, as modified and posted on the Commission’s website.” June 24, 2008 Entry at 7. To date, no such modified Appendix B has been posted to the Commission’s website or otherwise set forth in the docket. Further, the Gas Utilities, on September 8, 2009, filed approximately 235 current and proposed gas measures. Gas Utilities’ Comments at 5-11. Despite the Gas Utilities’ best efforts, they will not be able to file values and protocols for 235 gas measures based upon a currently unknown format by October 15, 2009.

The Gas Utilities intend to develop joint comments, values and protocols for submission to the Commission. Joint comments, values and protocols will serve the public interest and permit the Commission to consider unified recommendations from the Gas Utilities, rather than piecemeal proposals from separate utilities. The Commission expressed this idea in its Entry when it sought consensus comments from natural gas utilities regarding proposed measures (June 24, 2008 Entry at 6) and the issues set forth in Paragraph 7 of the Entry (June 24, 2008 Entry at 6-7).

The Gas Utilities need additional time to prepare joint comments, in part, because the Gas Utilities are reviewing the values and protocols developed by other states. The Commission encouraged such a review when the Commission suggested that it would be appropriate for the Gas Utilities to model values and protocols after the protocols developed by other states. Entry at 7. Thus, it will take the Gas Utilities additional time to develop comments, values and protocols for the Commission’s consideration. Given these efforts and the need to develop values and protocols unique to gas utilities, it is appropriate that the Commission grant this motion.

The Gas Utilities also seek an expedited ruling so that they may know whether they must file comments, values and protocols on October 15, 2009. An expedited ruling is appropriate because no other stakeholder is affected if the Commission grants the Gas Utilities' motion. All other stakeholders may still file their comments in accordance with the Commission's procedural schedule. The Commission may still issue a framework TRM in time for the electric utilities to use the TRM to prepare their portfolios for filing by January 1, 2010.

The Gas Utilities, pursuant to Rule 4901-1-12, have contacted all of the parties and certify that Ohio Partners for Affordable Energy is the only party that objects to the motion but has decided not to file a memorandum contra and does not object to expedited treatment of the motion. The electric utilities do not object to the motion if it applies to all parties, including the electric utilities. Granting this motion pursuant to expedited treatment will not adversely effect any person or entity which may be a stakeholder in the process set forth by the Commission in this matter.

For the reasons stated above, the Gas Utilities respectfully request the Commission provide an expedited ruling and amend the procedural schedule as requested.

Respectfully submitted,



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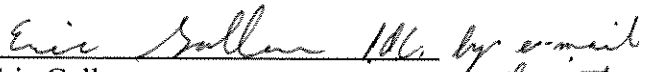
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