

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The East Ohio Gas Company d/b/a Dominion	)	
East Ohio for Approval to Modify and	)	Case No. 11-2401-GA-ALT
Further Accelerate its Pipeline Infrastructure	)	
Replacement Program and to Recover the	)	
Associated Costs.	)	

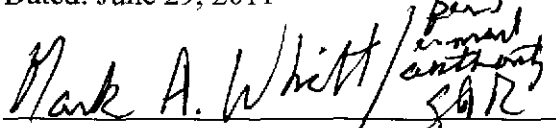
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**JOINT MOTION FOR EXTENSION OF TIME**  
**(Expedited Ruling Requested)**

Pursuant to Ohio Adm. Code 4901-1-13(A), The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") and Staff of the Public Utilities Commission of Ohio respectfully request issuance of an Entry continuing the deadline for filing Staff and Intervenor testimony to a date to be set by subsequent Entry. An expedited ruling is requested pursuant to Rule 4901-1-12(C). Parties whom DEO and Staff have been able to contact do not object to issuance of an expedited ruling without the filing of memoranda contra. This Motion should be granted for the reasons stated in the attached Memorandum in Support.

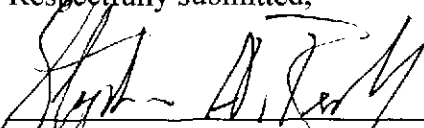
Dated: June 29, 2011

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Respectfully submitted,



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OHIO

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**MEMORANDUM IN SUPPORT OF  
JOINT MOTION FOR EXTENSION OF TIME**

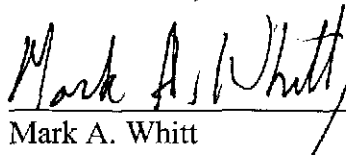
The Attorney Examiner's June 23, 2011 Entry granted an extension of time for the filing of Staff and Intervenor testimony until today, June 29, 2011. Staff requested the extension so that the Parties could continue to discuss settlement. Such settlement discussions have occurred but the Parties have not reached an agreement. If an agreement is reached -- and it looks like one will be, at the very least by some parties on some issues -- various reviews and authorizations need to be obtained before a stipulation may be signed. Doing this around the July 4 holiday weekend presents a challenge.

Dominion and Staff therefore request that the deadline for filing Staff and Intervenor testimony be extended to a date to be established in a subsequent Entry. To the extent necessary, the new testimony filing deadline and other procedural issues can be discussed at the July 6, 2011 hearing.

Extensions of time to file pleadings may be granted "upon motion of any party for good cause shown...." Ohio Adm. Code 4901-1-13(A). The Commission, Legal Director, Deputy Legal Director and Attorney Examiner may also grant extensions on their own motion. *Id.* Ongoing, good faith settlement negotiations are good cause to grant this Motion.

DEO and Staff request an expedited ruling, and represent that the respective counsel for Office of Ohio Consumers' Counsel, Ohio Partners for Affordable Energy, Utility Workers of America-Local G555 and Industrial Energy Users-Ohio do not object to the issuance of ruling without the filing of memoranda contra. Attempts to contact parties represented by attorney Joseph Meissner were unsuccessful. Rule 4901-1-13(A) nonetheless authorizes the Attorney Examiner to grant this Motion without the filing of memoranda contra.

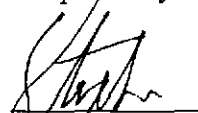
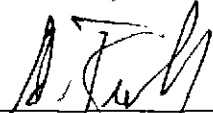
Date: June 29, 2011

 *per  
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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Extension of Time was served by electronic mail to the following persons on this 29th day of June, 2011:

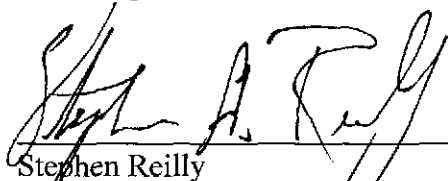
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