

THE PUBLIC UTILITIES COMMISSION OF OHIO

**MOTION OF NORTHEAST OHIO NATURAL GAS CORPORATION TO EXTEND  
LONG-TERM FORECAST REPORT DUE DATE**

Respectfully submitted,

Counsel for  
Northeast Ohio Natural Gas Corporation

## MEMORANDUM IN SUPPORT

By an Entry on July 13, 2011, the Attorney Examiner granted a motion by Northeast Ohio Natural Gas Corporation (“NEO”) for an extension of time to file the LTFR within 60 days after the Commission’s Finding and Order in Case No. 10-209-GA-GCR. The Commission entered its Opinion and Order on October 26, 2011, and NEO filed its Application for Rehearing on November 22, 2011. On December 14, 2011 the Commission issued an Entry on Rehearing affirming the Opinion and Order. On January 10, 2012, NEO filed its Motion for Clarification and Alternative Application for Rehearing. On January 23, 2012 the Commission issued an Entry Nunc Pro Tunc, stating that it did not consider necessary any further consideration of NEO’s January 10 filing.

Although the Opinion and Order has been affirmed on rehearing and is now final, until the issuance of the Entry Nunc Pro Tunc on January 23, 2012 NEO could not commence the competitive bidding process established by the Stipulation and Recommendation in Case No. 10-209-GA-GCR which was adopted by the Commission in that proceeding.

Ohio Administrative Code Rule 4901:5-7-05 requires reporting natural gas companies serving 15,000 to 100,000 customers to base their forecasts of supply on “independent analysis of alternative sources of gas as well as its current sources.” As noted, this is NEO’s initial LTFR, as it only recently met the 15,000 customer reporting threshold. Moreover, the analysis of supplies potentially available to it will be fundamentally based on the information it will gain through the initial competitive bid process which it is preparing to initiate, in consultation with Staff and the Office of

Consumers' Counsel, with the intention to receive, evaluate and select successful bidder(s) for supply commencing in April, 2012.

Staff has authorized counsel for NEO to state that it does not oppose the requested extension of time for NEO to submit its initial LTFR for a period of thirty (30) days subsequent to the date of acceptance of competitive bids for asset management and gas supply services. This extension of time will permit the Company to provide more informed estimates supporting its forecast of supply and prices.

WHEREFORE, Northeast Ohio Natural Gas Corporation respectfully requests that the relief specified in the foregoing Motion be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew J. Sonderman", with a long horizontal line extending to the right.

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Summary: Motion Motion to Extend Due Date electronically filed by Mr. Andrew J Sonderman  
on behalf of Northeast Ohio Natural Gas Corporation