

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the	:	
Purchased Gas Adjustment Clause	:	Case No. 14-206-GA-GCR
Contained Within the Rate Schedules of	:	Case No. 14-209-GA-GCR
Brainard Gas, Corporation, Northeast	:	Case No. 14-212-GA-GCR
Ohio Natural Gas and Orwell Natural	:	
Gas Company Corporation and Related	:	
Matters.	:	

In the Matter of the Uncollectible	:	
Expense Riders of Northeast Ohio	:	Case No. 14-309-GA-UEX
Natural Gas Corporation and Orwell	:	Case No. 14-312-GA-UEX
Natural Gas Company and Related	:	
Matters.	:	

In the Matter of the Percentage of	:	
Income Payment Plan Rider of	:	Case No. 14-409-GA-PIP
Northeast Ohio Natural Gas	:	
Corporation and Related Matters.	:	

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**MOTION FOR CONTINUANCE  
ON BEHALF OF THE STAFF OF THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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The Staff of the Public Utilities Commission of Ohio respectfully requests that the date for the hearing of these matters be continued for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

*/s/Werner L. Margard III*

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## MEMORANDUM IN SUPPORT

By entry dated February 13, 2014 the Public Utilities Commission of Ohio (“Commission”) scheduled these cases for hearing on January 20, 2015. Pursuant to paragraphs (5), (10) and (12) of the entry, the Staff’s audit reports are currently due on or before November 21, 2014. Staff states that it cannot reasonably complete its audits and reports in these cases prior to January 12, 2015.

There have been extended delays in the exchange of information necessary to enable the Staff to complete its auditing task by the November 21, 2014 deadline. While Staff wishes to state that the companies have not been uncooperative, circumstances, of which the Commission is well aware, have made it difficult for Staff to complete its work on a timely basis.

For example, Staff contacted the companies in mid-August indicating that it desired to conduct its on-site audit in early September. The companies responded that its accounting team was supporting the forensic audit ordered by the Commission in Case No. 14-205-GA-COI, *In the Matter of the Commission Investigative Audit of Brainard Gas Corp. / Northeast Ohio Gas Corporation / Orwell Natural Gas Company*, and could not be available until late September. (The draft audit report in that case is to be submitted to Staff on or before December 15, 2014.)

Inasmuch as the Staff requested the forensic audit in the companies’ last GCR proceedings, it fully supports the efforts of both the companies and the auditors to successfully complete that process. Staff’s ability to complete its own audits, however,

has been impacted. Staff therefore requests what it submits is a reasonable continuance of approximately six (6) weeks to conclude its work.

It is in the public interest to continue and reschedule the January 20, 2015 hearing date for Brainard Natural Gas Corp., Northeast Ohio Natural Gas Corporation, and Orwell Natural Gas Company to a date certain on or after March 13, 2015. Such a continuance would provide Staff with adequate opportunity and resources to complete its statutory responsibilities.

Respectfully submitted,

/s/Werner L. Margard III

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## **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing **Motion for Continuance**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by via electronic mail upon the following parties of record, this 12<sup>th</sup> day of November, 2014.

*/s/Werner L. Margard III*

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### **Parties of Record:**

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**Case No(s). 14-0206-GA-GCR, 14-0309-GA-UEX, 14-0409-GA-PIP**

Summary: Motion Motion for Continuance electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO