

**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. :

**MOTION FOR CONTINUANCE
ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO
AND REQUEST FOR EXPEDITED CONSIDERATION**

On November 25, 2014, the Commission ordered that its Staff file its GCR audit reports, UEX audit reports, and PIPP audit report in these cases by January 22, 2015. Staff respectfully requests that the date for filing its reports, and, consequently, the hearing date, be continued for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

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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 that Entry, the Staff’s audit reports were originally due on or before November 21, 2014. On November 12, 2014, Staff requested a continuance of the filing date for its audit reports stating that it could not reasonably complete its audits and reports prior to January 12, 2015.

By Entry issued November 25, 2014, the Attorney Examiner granted Staff’s motion. That Entry directed that Staff file its GCR audit reports, UEX audit reports, and PIPP audit report by January 22, 2015, and that the date for the public hearing be continued to March 24, 2015.

Staff’s senior management is currently completing its final review of the draft reports. Due to circumstances beyond its control, it will not be able to complete that

review in time for Staff to file its reports as ordered. A further continuance, albeit only a few days, is needed for Staff to complete its work. Staff requests that it be granted an extension until Tuesday, January 27, 2015 in which to file the audit reports in these cases.

Rule 4901:1-14-08(A) requires that the public hearing in these cases be held at least sixty days after the filing of the audit reports. Inasmuch as the new filing date will be less than sixty days prior to the currently scheduled hearing date of March 24, 2015, Staff also respectfully requests that the hearing likewise be continued. As it appears that all parties and the Attorney Examiner would be available to convene the hearing on April 7, 2015, Staff requests that the hearing date be continued until that date.

Pursuant to Rule 4901-1-12(C), Staff also requests expedited consideration of this motion. Counsel has contacted all other parties to determine whether any party objects to the issuance of an expedited ruling without the filing of memoranda. I hereby certify that no party objects to the issuance of such a ruling, and that an immediate ruling may be issued.

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,

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Continuance, and Request for Expedited Consideration**, 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 22nd day of January, 2015.

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Case No(s). 14-0206-GA-GCR, 14-0209-GA-GCR, 14-0212-GA-GCR, 14-0309-GA-UEx, 14-0312-GA-UEx

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