

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the	:	
Purchased Gas Adjustment Clauses	:	Case No. 14-0206-GA-GCR
Contained within the Rate Schedules of	:	Case No. 14-0209-GA-GCR
Brainard Gas Corporation, Northeast Ohio	:	Case No. 14-0212-GA-GCR
Natural Gas Corporation and Orwell	:	
Natural Gas Company and Related	:	
Matters.	:	
	:	
	:	
In the Matter of the Uncollectible Expense	:	Case No. 14-0309-GA-UEX
Riders of Northeast Ohio Natural Gas	:	Case No. 14-0312-GA-UEX
Corporation and Orwell Natural Gas	:	
Company.	:	
	:	
	:	
In the Matter of the Percentage of Income	:	Case No. 14-0409-GA-PIP
Payment Plan Rider of Northeast Ohio	:	
Gas Corporation.	:	

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**JOINT MOTION FOR EXTENSION OF THE PROCEDURAL SCHEDULE AND  
REQUEST FOR EXPEDITED TREATMENT**

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Pursuant to Ohio Administrative Code (“O.A.C.”) 4901-1-12(A),(C) and 4901-1-13(A), Brainard Gas Corporation (“Brainard”), Orwell Natural Gas Company (“Orwell”), Northeast Ohio Natural Gas Corporation (“Northeast”) (collectively, the “Companies”), the Office of the Ohio Consumers’ Counsel (“OCC”), and the Staff of the Public Utilities Commission of Ohio (“Staff”) respectfully request an extension of the procedural schedule in the above-captioned proceedings. Specifically, the Parties request that the hearing currently scheduled for Tuesday, April 7, 2015 be continued until **Tuesday, June 2, 2015**. The Parties request that the deadlines for publishing notice and the filing of testimony be extended as well. In addition, the Parties request expedited ruling on

this Motion pursuant to Rule 4901-1-12(C), O.A.C. The reasons supporting this Motion are below in the Memorandum in Support.

Respectfully submitted,

/s/ Mark S. Yurick

Mark S. Yurick  
Taft, Stettinius & Hollister, LLP  
65 East State Street, Suite 1000  
Columbus, Ohio 43215  
Telephone: (614) 221-4000  
Facsimile: (614) 221-4012  
[myurick@taftlaw.com](mailto:myurick@taftlaw.com)

*Attorney for the Companies*

/s/ Joseph P. Serio

Joseph P. Serio  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
Telephone: (614) 466-9565  
[Joseph.serio@occ.ohio.gov](mailto:Joseph.serio@occ.ohio.gov)

*Attorney for the Consumers' Counsel*

/s/ Werner L. Margard III

Werner L. Margard  
Assistant Attorney General  
Ohio Attorney General's Office  
Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
Telephone: (614) 466-4396  
Facsimile: (614) 644-8764  
[werner.margard@puc.state.oh.us](mailto:werner.margard@puc.state.oh.us)

*Attorney for PUCO Staff*

## MEMORANDUM IN SUPPORT

By entry dated January 23, 2015, the Attorney Examiner set the above captioned cases (the “Cases”) for hearing on April 7, 2015. The Parties are engaging in substantive settlement discussions regarding the Cases. An extension of time will allow the Parties to continue to engage in meaningful settlement discussions. Concentrating on settlement, rather than expending time and effort in preparing for litigation is preferable for all Parties at this time.

The Parties respectfully request an extension of the hearing currently scheduled for April 7, 2015. The Parties request that the hearing be continued until **June 2, 2015**. The Parties agree this amount of time is necessary because of the various cases the Companies currently have pending before the Commission.<sup>1</sup> There are number of interrelated, complex issues involved in all of these cases, and each issue requires (and deserves) careful consideration by the Parties before any settlement is reached. This extension will allow the Parties to have productive settlement discussions regarding the Cases, while also allowing the Companies to adequately address issues raised in the COI case and Brainard’s transportation agreement case. Additionally, the Parties request an expedited ruling on this motion.

No one will be prejudiced by the granting of this motion. The Companies have not published notice regarding the hearing yet.

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<sup>1</sup> *In the Matter of the Investigative Audit of Northeast Ohio Natural Gas Corporation, Orwell Natural Gas Company, and Brainard Gas Corporation*, Case No. 14-205-GA-COI (“COI Case”) and *In the Matter of the Application of Brainard Gas Corporation for Approval of Five Transportation Agreements*, Case No. 14-948-GA-AEC.

Respectfully submitted,

/s/ Mark S. Yurick

Mark S. Yurick  
Taft, Stettinius & Hollister, LLP  
65 East State Street, Suite 1000  
Columbus, Ohio 43215  
Telephone: (614) 221-4000  
Facsimile: (614) 221-4012  
[myurick@taftlaw.com](mailto:myurick@taftlaw.com)

*Attorney for the Companies*

/s/ Joseph P. Serio

Joseph P. Serio  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
Telephone: (614) 466-9565  
[Joseph.serio@occ.ohio.gov](mailto:Joseph.serio@occ.ohio.gov)

*Attorney for the Consumers' Counsel*

/s/ Werner L. Margard III

Werner L. Margard  
Assistant Attorney General  
Ohio Attorney General's Office  
Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
Telephone: (614) 466-4396  
Facsimile: (614) 644-8764  
[werner.margard@puc.state.oh.us](mailto:werner.margard@puc.state.oh.us)

*Attorney for PUCO Staff*

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of *Joint Motion for Extension of the Procedural Schedule and Request for Expedited Treatment* was served this 17th day of March, 2015 by electronic mail upon the following:

Werner L. Margard  
Assistant Attorneys General  
Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
Email: [werner.margard@puc.state.oh.us](mailto:werner.margard@puc.state.oh.us)

Joseph P. Serio  
Assistant Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215  
Email: [serio@occ.state.oh.us](mailto:serio@occ.state.oh.us)

/s/ Mark S. Yurick  
Mark S. Yurick

**This foregoing document was electronically filed with the Public Utilities**

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**3/17/2015 4:33:55 PM**

**in**

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

Summary: Motion Joint Motion for Extension of the Procedural Schedule and Request for Expedited Treatment electronically filed by Mark Yurick on behalf of Brainard Gas Corporation and Northeast Ohio Natural Gas Corporation and Orwell Natural Gas Company