BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Regulation of the : Purchased Gas Adjustment Clauses : Contained within the Rate Schedules of : Brainard Gas Corporation, Northeast Ohio Natural Gas Corporation and Orwell Natural Gas Company and Related

Case No. 14-0206-GA-GCR Case No. 14-0209-GA-GCR Case No. 14-0212-GA-GCR

Matters. In the Matter of the Uncollectible Expense

Riders of Northeast Ohio Natural Gas: Corporation and Orwell Natural Gas

Case No. 14-0309-GA-UEX Case No. 14-0312-GA-UEX

Company.

Case No. 14-0409-GA-PIP

In the Matter of the Percentage of Income : Payment Plan Rider of Northeast Ohio Gas Corporation.

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

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, June 2, 2015 be continued until Tuesday, September 1, 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,

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MEMORANDUM IN SUPPORT

By entry dated March 23, 2015, the Attorney Examiner set the above captioned cases (the "Cases") for hearing on June 2, 2015. The Parties are engaged 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 preparing for litigation is preferable for all Parties at this time.

The Parties respectfully request a continuance of the hearing currently scheduled for June 2, 2015. The Parties request that the hearing be continued to **September 1, 2015**. There are various cases involving the Companies that are currently pending before the Commission. These cases involve a number of complex and overlapping issues. The Parties need more time to analyze these various issues in order to have fruitful settlement discussions. Further, discovery is still ongoing in some of these cases, including the GCR cases. This extension of time will allow the Companies to respond to discovery, which will result in more productive settlement discussions.

For the foregoing reasons, the Parties request a continuance of the hearing date. In addition, 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.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of *Joint Motion for Extension of the Procedural* **Schedule an Request for Expedited Treatment** was served this 13th day of May, 2015 by electronic mail upon the following:

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

Summary: Motion Joint Motion to Extend Procedural Schedule electronically filed by Mr. Devin D. Parram on behalf of Northeast Ohio and Brainard Gas and Orwell Natural Gas