

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Suburban Natural Gas Company for	)	Case No. 15-1048-GA-RDR
Approval of An Adjustment to the	)	
Infrastructure Replacement Program Rider	)	

---

**MOTION FOR CONTINUANCE AND REQUEST FOR EXPEDITED TREATMENT**

---

Pursuant to Ohio Administrative Code Rules 4901-1-12 and 4901-1-13,<sup>1</sup> Suburban Natural Gas Company (“Suburban” or “Company”) respectfully moves the Public Utilities Commission of Ohio (“PUCO” or “Commission”) for a six-day continuance to file expert testimony in this case. Suburban requests that the deadline to file expert testimony be continued from Wednesday, October 7, 2015, to Tuesday, October 13, 2015, for good cause shown. The reasons in support of this continuance are set forth in the attached memorandum in support.

In accordance with O.A.C. Rule 4901-1-12(C), Suburban respectfully requests an expedited ruling in response to this Motion. The Assistant Attorney General and PUCO Staff assigned to this case have been contacted and agree to the issuance of such a ruling.

Respectfully submitted,

---

<sup>1</sup> Ohio Adm. Code 4901-1-13(A) states: “Except as otherwise provided by law, and notwithstanding any other provision in this chapter, continuances of public hearings and extensions of time to file pleadings or other papers may be granted upon motion of any party for good cause shown, or upon motion of the commission, the legal director, the deputy legal director, or an attorney examiner.”

**/s/ Christopher J. Allwein**

Christopher J. Allwein (0084914)

Kegler Brown Hill & Ritter LPA

Capitol Square, Suite 1800

65 East State Street

Columbus, Ohio 43215

Telephone: (614) 462-5400

Facsimile: (614) 464-2634

[callwein@keglerbrown.com](mailto:callwein@keglerbrown.com)

**Attorney for Suburban Natural Gas Company**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Suburban Natural Gas Company for	)	Case No. 15-1048-GA-RDR
Approval of An Adjustment to the	)	
Infrastructure Replacement Program Rider	)	

---

**MEMORANDUM IN SUPPORT OF  
MOTION FOR CONTINUANCE AND REQUEST FOR EXPEDITED TREATMENT**

---

Suburban respectfully requests that the deadline to file expert testimony in this case be continued for six days until Tuesday, October 13, 2015.<sup>2</sup> Subsequent to the Attorney-Examiner's October 2, 2015 Entry, Company representatives have continued serious, ongoing discussions with Commission Staff and the Assistant Attorney General in seeking to resolve the differences between the Company's proposal and Staff's Recommendation in this case via stipulation. Although the Attorney-Examiner's October 2 Entry afforded the Company an opportunity to file an additional statement, the remaining procedural schedule - including the requirement that expert testimony be filed no later than October 7 - remained unmodified.

Accordingly, Suburban submits that good cause exists for a six-day extension of the filing of all expert testimony. This will allow the Staff and the Company to focus on discussions and potentially resolve outstanding issues in the case. Such resolution would be memorialized in a stipulation and render expert testimony by the Company and Staff unnecessary. By affording the parties additional time to resolve such issues, the Commission will ensure it is expending its resources in this proceeding as efficiently as possible.

---

<sup>2</sup> The current deadline for filing expert testimony is Wednesday, October 7.  
107059.000001/#4816-4158-4937 v1

Because expert testimony is due tomorrow without an extension, the Company respectfully requests an expedited ruling on this Motion. Suburban discussed a continuance with Staff, who authorized Suburban to represent that Staff agrees to the issuance of such a ruling. Accordingly, Suburban Natural Gas Company respectfully requests that the Commission rule on this Motion prior to the close of business tomorrow, October 7.

Respectfully submitted,

**/s/ Christopher J. Allwein**

Christopher J. Allwein (0084914)

Kegler Brown Hill & Ritter LPA

Capitol Square, Suite 1800

65 East State Street

Columbus, Ohio 43215

Telephone: (614) 462-5400

Facsimile: (614) 464-2634

[callwein@keglerbrown.com](mailto:callwein@keglerbrown.com)

**Attorney for Suburban Natural Gas Company**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion for Continuance and Request for Expedited Treatment* was served upon the following parties of record or as a courtesy, via electronic mail, on October 6, 2015.

**/s/ Christopher J. Allwein**  
Christopher J. Allwein

William L. Wright  
**Section Chief**

John Jones  
**Assistant Attorney General**  
Public Utilities Section  
180 East Broad Street, 6th Floor  
Columbus, OH 43215-3793  
614.466.4397 (telephone)  
614.644.8764 (fax)  
[john.jones@puc.state.oh.us](mailto:john.jones@puc.state.oh.us)  
[William.wright@puc.state.oh.us](mailto:William.wright@puc.state.oh.us)

**Courtesy Copies:**

Doris E. McCarter  
Rates and Analysis Department  
Division Chief, Forecasting, Markets and Corporate Oversight  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215  
[doris.mccarter@puc.state.oh.us](mailto:doris.mccarter@puc.state.oh.us)

L. Douglas Jennings  
Attorney Examiner  
[Douglas.Jennings@puc.state.oh.us](mailto:Douglas.Jennings@puc.state.oh.us)

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

**Commission of Ohio Docketing Information System on**

**10/6/2015 5:11:28 PM**

**in**

**Case No(s). 15-1048-GA-RDR**

Summary: Motion for Continuance and Request for Expedited Ruling electronically filed by Mr. Christopher J. Allwein on behalf of Suburban Natural Gas Company