

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Application of)	
Brainard Gas Corp., Northeast Ohio Gas)	
Corp., Orwell Natural Gas Company and)	Case No. 16-2251-GA-UNC
Spelman Pipeline Holdings, LLC for)	
Approval of Merger with FR Bison Holdings,)	
Inc. and FR Bison Merger Sub, Inc.)	

**MOTION FOR EXTENSION OF TIME
FOR THE FILING OF
COMMENTS**

The Staff of the Public Utilities Commission of Ohio respectfully requests that the date for the filing of the comments be extended. Specifically, Staff requests that the parties be permitted an additional 45 days, or until Monday, May 22, 2017, to file their initial comments in this case, with the reply comments to be filed within two (2) weeks thereafter, or by June 5, 2017. This request is made pursuant to O.A.C. 4901-1-13(A).

By Entry issued March 2, 2017, the deadline for filing comments was established as Friday, April 7, 2017. As the Commission is aware, there are similar proceedings ongoing in the other jurisdictions (Maine, Montana, and North Carolina) where Gas Natural Inc. (“GNI”), the parent company of Brainard Gas Corp., Northeast Ohio Gas Corp., Orwell Natural Gas Company and Spelman Pipeline Holdings, LLC (“companies”), is also seeking approval of the merger that is the subject of this case. Comments and testimony has yet to be filed in those cases, and evidentiary hearings have not occurred, and are not scheduled until as late as June in Montana. Staff believes that it would benefit greatly from monitoring the progress of those proceedings in evaluating this proposed merger.

Staff solicited the authorization of the parties in this case to the requested extension. While the Office of the Consumers' Counsel had no objection, the companies requested that the extension not exceed 30 days. Staff, however, respectfully submits that 30 days would be insufficient, especially inasmuch as hearings in two (2) of the three (3) other jurisdictions would not have even begun within such time. Give the procedural schedules in the other jurisdictions, Staff respectfully submits that the parties will not be unduly prejudiced or harmed by the requested extension.

WHEREFORE, Staff respectfully request that the date for the filing of the comments in this matter be extended until May 22, 2017, with reply comments to be filed by June 5, 2017.

Respectfully submitted,

Mike DeWine
Attorney General

/s/ Werner L. Margard III

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Extension of Time for the of Comments was served by regular U.S. mail, postage pre-paid, or hand-delivered and sent by facsimile, to the following parties of record, this 4th day of April, 2017.

/s/Werner L. Margard III

Werner L. Margard III

Assistant Attorney General

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in

Case No(s). 16-2251-GA-UNC

Summary: Motion for Extension of Time for the Filing of Comments submitted by Assistant Attorney General Werner Margard on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio