

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's :  
Investigation into Ohio Rural Natural Gas : Case No. 16-1578-GA-COI  
Co-Op and Related Matters. :

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**REPLY TO MOTION TO EXTEND DEADLINE  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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On April 17, 2017, the Public Utilities Commission of Ohio (Commission or PUCO) approved a stipulation and recommendation filed by Ohio Rural Natural Gas Co-op (ORNG), Ludlow Natural Gas Company, LLC (Ludlow) (collectively, the Companies), and Staff of the PUCO (Staff). Among other agreements of the parties in the stipulation and recommendation is the term that by July 15, 2017, the Companies will sell and transfer the assets and operations to a third party approved by the Commission. Additionally, the parties agreed that “[i]n the event that [Utility Technologies International] does not continue to function as the compliance manager for any reason, the parties agree that Staff will select a replacement compliance manager to be retained and paid by ORNG or Ludlow.”

On July 14, 2017, the Companies filed a motion to extend the July 15, 2017 deadline to August 31, 2017. In addition, the Companies’ motion indicates that the Companies have entered into an agreement with Utility Pipeline Ltd. (UPL) to operate and maintain the assets until the final asset transfer to UPL is complete. Staff received a copy of the signed document as indicated in the motion.

Staff has reviewed the motion and the accompanying agreement between the Companies and does not oppose a *brief* extension to allow the Companies to complete the

final purchase agreement and file the purchase agreement and an application to transfer the assets with the Commission no later than July 31, 2017.

Furthermore, Staff has reviewed the experience and capabilities of UPL and determined that UPL will serve as a suitable replacement compliance manager. In addition, it is Staff's expectation that not only will UPL serve as the compliance manager for day-to-day operations and compliance with gas pipeline safety requirements but also will operate and maintain all of the assets for emergency response, including response to leak complaints and odor of gas complaints. It is also Staff's expectation that ORNG or Ludlow will compensate UPL for this work.

**Michael DeWine**  
Ohio Attorney General

**William L. Wright**  
Section Chief

*/s/ Werner L. Margard*

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**On behalf of the Staff of  
The Public Utilities Commission of Ohio**

## **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing **Reply** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or hand-delivered, upon the following Parties of Record, this 18<sup>th</sup> day of July, 2017.

/s/ Werner L. Margard

**Werner L. Margard**

Assistant Attorney General

### **Parties of Record:**

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**Case No(s). 16-1578-GA-COI**

Summary: Reply To Motion To Extend Deadline electronically filed by Mrs. Tonneta Y Scott  
on behalf of PUCO