

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co- )  
lumbia Gas of Ohio, Inc. for Approval ) Case No. 16-2422-GA-ALT  
of an Alternative Form of Regulation to )  
Extend and Increase Its Infrastructure )  
Replacement Program. )

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**MOTION OF COLUMBIA GAS OF OHIO, INC., FOR  
EXTENSION AND REQUEST FOR EXPEDITED RULING**

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Pursuant to Rules 4901-1-12(C) and 4901-1-13(A), Ohio Administrative Code, Columbia Gas of Ohio, Inc. ("Columbia") respectfully requests an additional four-day extension of the deadline for filing objections to the Staff Report. Columbia seeks this additional extension because the parties in this proceeding are currently engaging in settlement discussions that may make the filing of objections unnecessary. A memorandum in support of this motion is attached.

Respectfully submitted,

/s/ Eric B. Gallon

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## MEMORANDUM IN SUPPORT

On February 27, 2017, Columbia filed its application for authorization to continue its alternative rate plan (most recently reapproved in Case No. 11-5515-GA-ALT) for another five-year period (2018-2022). On March 24, Commission Staff informed Columbia by letter that Columbia's application complied with Rule 4901:1-19-06, Ohio Adm. Code ("O.A.C."). On April 6, the Commission issued an Entry setting deadlines of July 10, 2017, for the filing of the Staff Report on Columbia's application and of August 9, 2017, for the filing of objections to the Staff Report or to the application. On July 10, Staff issued a report recommending that the Commission approve Columbia's application with modifications. On August 7, Columbia moved for a waiver of the Commission's 30-day deadline for filing objections to staff reports and a five-day extension of the August 9th deadline. On August 8, the Commission granted that motion and extended the deadline for objections to the Staff Report to August 14, 2017.

Columbia now moves the Commission to further extend the deadline for filing objections to the Staff Report by an additional four days. The Commission's rules allow parties to file motions to extend deadlines "for good cause shown," so long as those motions are timely and, if the motion is filed fewer than five business days before the relevant deadline, the other parties receive "a brief summary of the request." Rule 4901-1-13(B), O.A.C. Here, Columbia has good cause for the request. Since the Commission granted the prior extension, the parties (including the Office of the Ohio Consumers' Counsel) have engaged in settlement negotiations with Staff, in an effort to resolve the intervening parties' and Staff's questions and concerns regarding Columbia's application. The negotiation of a Joint Stipulation and Recommendation could make the filing of objections to the Staff Report unnecessary. This motion is also timely. Columbia is filing this motion a day in advance of the relevant deadline and Columbia has not received any objections to this motion from the parties.

For all of these reasons, as permitted by Rules 4901-1-12(C) and 4901-1-13(A), Ohio Adm. Code, Columbia respectfully requests that this Commission extend the deadline for filing objections to the Staff Report by an additional four days, to Friday, August 18, 2017. Columbia respectfully requests an expedited ruling on this motion.

Respectfully submitted,

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### CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 11th day of August, 2017, upon the parties listed below.

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Summary: Motion for Extension and Request for Expedited Ruling electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.