

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co-	)
Columbia Gas of Ohio, Inc. for Approval	)
of an Alternative Form of Regulation to	)
Extend and Increase Its Infrastructure	)
Replacement Program.	)

Case No. 16-2422-GA-ALT

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**JOINT MOTION OF COLUMBIA GAS OF OHIO, INC.,  
COMMISSION STAFF, INDUSTRIAL ENERGY USERS-OHIO,  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL,  
AND OHIO PARTNERS FOR AFFORDABLE ENERGY  
TO REVISE PROCEDURAL SCHEDULE**

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Pursuant to Rule 4901-1-12(C), Ohio Admin. Code, Columbia Gas of Ohio, Inc. ("Columbia"), Commission Staff,<sup>1</sup> the Office of the Ohio Consumers' Counsel ("OCC"), Ohio Partners for Affordable Energy ("OPAE"), and Industrial Energy Users-Ohio ("IEU-Ohio") respectfully request that the Commission re-schedule the hearing date in this matter to allow for earlier post-hearing briefing. The parties also propose an agreement to admit certain specified documents and testimony at hearing, to waive cross-examination of witnesses, and to set a post-hearing briefing schedule. A memorandum in support of this motion is attached.

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<sup>1</sup> For purposes of this Motion, Staff is considered a party under Rule 4901-1-10(C), Ohio Admin. Code.

Respectfully submitted,

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Ohio Attorney General

**William L. Wright**  
Section Chief

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**COUNSEL FOR INDUSTRIAL  
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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 Admin. Code. On July 10, Staff issued a report recommending that the Commission approve Columbia's application with modifications. On August 14, OCC filed its objections to Columbia's application and the Staff report. On August 18, Columbia, Staff, and OP&E filed a joint stipulation and recommendation. On September 6, the Commission held a conference call with the parties to establish a procedural schedule. Following that call, the Commission issued an Entry setting deadlines for the filing of testimony in support of and in opposition to the stipulation (September 8 and 28, respectively) and scheduling the evidentiary hearing for this matter to begin on October 11.

Following the conference call on September 6, the parties conferred and ultimately reached agreement on a process to expedite the consideration of Columbia's application, the joint stipulation and recommendation, and OCC's opposition to both. In particular, the parties have agreed that, at the hearing in this matter, they will not object to the admission into evidence of the following documents filed or to be filed in this matter:

- Columbia's Application (including the attached Exhibits), filed on February 27, 2017;
- the testimony of Diana M. Beil, Donald P. Ayers, and Melissa L. Thompson, filed on February 27, 2017;
- the Report by the Staff of the Public Utilities Commission of Ohio, filed on July 10, 2017;
- OCC's Objections to Columbia's Application and the PUCO Staff's Report of Investigation, filed on August 14, 2017;
- the Joint Stipulation and Recommendation, filed on August 18, 2017;
- the Supplemental Direct Testimony of Melissa L. Thompson, filed on September 8, 2017; and

- all testimony filed in opposition to the stipulation by September 28, 2017.

The parties have further agreed that they will waive cross-examination of all witnesses at the hearing in this matter.

The waiver of cross-examination and agreed admission into evidence of the testimony and other documents specified above will allow for a greatly shortened hearing, thereby potentially allowing an earlier beginning (and end) to post-hearing briefing. Accordingly, the parties respectfully request that the Commission reschedule the hearing to an earlier date. The parties have conferred and are available for a rescheduled hearing on October 2, 2017. Unfortunately, there is no other date before October 11, 2017, when all of the undersigned counsel are available.

The parties have also conferred and reached agreement on a post-hearing briefing schedule. The parties propose that the Commission allow the parties three weeks (until October 23) to file their initial post-hearing briefs and an additional two weeks and one day (until November 7) to file reply briefs. This proposed briefing schedule would allow the completion of post-hearing briefing by early November, which would aid the issuance of a Commission decision before Columbia's current alternative rate plan expires.

OCC's agreement to support the request to reschedule the evidentiary hearing date is contingent on the implementation of the proposed briefing schedule. That is, if the parties are not given at least three weeks to file initial post-hearing briefs and at least two weeks to file reply briefs then OCC does not agree to move the evidentiary hearing date of October 11, 2017.

For all of these reasons, Columbia Gas of Ohio, Inc., Commission Staff, the Office of the Ohio Consumers' Counsel, Industrial Energy Users-Ohio, and Ohio Partners for Affordable Energy respectfully request that this Commission reschedule the evidentiary hearing in this matter to October 2, 2017; adopt the parties' proposal regarding the admission into evidence of the documents and testimony specified above and the waiver of witness cross-examination; and adopt the proposed briefing schedule.

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 20th day of September, 2017, upon the parties listed below.

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Summary: Motion of Columbia Gas of Ohio, Inc., Commission Staff, Industrial Energy Users-Ohio, The Office of the Ohio Consumers' Counsel, and Ohio Partners for Affordable Energy to Revise Procedural Schedule electronically filed by Mr. Eric B. Gallon on behalf of Columbia Gas of Ohio, Inc.