

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Gregory P. Weaver,	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 18-1414-EL-CSS
	)	
North American Power and Gas, LLC,	)	
	)	
Respondent.	)	

**MOTION OF NORTH AMERICAN POWER AND GAS, LLC  
FOR LEAVE TO FILE OUT OF TIME**

Pursuant to Ohio Administrative Code Rule 4901:1-12, North American Power and Gas, LLC files this motion seeking leave to file an answer out of time to the complaint of Gregory P. Weaver in this matter. Good cause exists for granting this motion. The reasons supporting such good cause are set forth in the accompanying memorandum in support.

WHEREFORE, North American Power and Gas, LLC respectfully moves that the Public Utilities Commission of Ohio permit it to file its answer in this matter out of time.

Respectfully submitted,

/s/ Gretchen L. Petrucci

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*Attorneys for North American Power and Gas, LLC*

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North American Power and Gas, LLC,	)	
	)	
Respondent.	)	

**MEMORANDUM IN SUPPORT**

On September 11, 2018, a complaint was filed in Case No. 18-1414-EL-CSS against North American Power and Gas, LLC (“NAP&G”). The Public Utilities Commission of Ohio (“Commission”) forwarded the complaint to NAP&G, but the appropriate personnel was out of the office on an extended vacation and was unable to engage counsel to respond to the answer prior to the 20-day period for filing an answer. NAP&G, however, promptly engaged the undersigned to prepare and file an answer in addition to submitting this motion for leave. The Commission may also note that NAP&G is reaching out to Mr. Weaver to further discuss the matter and possibly settle the complaint. Thus, for all of the foregoing reasons, NAP&G submits that good cause exists for allowing it to file its answer out of time.

WHEREFORE, North American Power and Gas, LLC respectfully requests that the Commission permit it to file its answer out of time so that this complaint can be resolved.

Respectfully submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

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### **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the Complainant this 23<sup>rd</sup> day of October 2018, as follows:

- Via regular U.S. Mail to Gregory P. Weaver, 2870 Chatham Road, Pepper Pike, Ohio 44124.

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

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

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**Case No(s). 18-1414-EL-CSS**

Summary: Motion for Leave to File Out of Time electronically filed by Mrs. Gretchen L. Petrucci on behalf of North American Power and Gas, LLC