

FILE
FAX

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

ERIN DAHL,

-Complainant/Plaintiff

v.

THE EAST OHIO GAS COMPANY D/B/A
DOMINION ENERGY OHIO

-Respondent/Defendant

Case No. 17-1822-GA-CSS

MOTION FOR CONTINUANCE

In accordance with Ohio Adm. Code 4901-1-12 and in response to my request for a hearing with the Public Utilities Commission of Ohio regarding fraudulent billing by Dominion East Ohio/East Ohio Gas Company, and two subsequent scheduled Meter Tests, for which they did not comply with any of the Ohio Revised Statutes that govern the protocol for the procedure, a hearing was ORDERED. A hearing is scheduled for January 31, 2019 at 10:00 a.m., in the Offices of the Commissions Hearing Room 11- A, 11th Floor, 180 E. Broad Street, Columbus, OH 43215-3793. I am requesting a final Continuance of the court of 30-days. Good cause exists to grant my request for a Motion for a Continuance, which is set forth in the attached memorandum in support as required by OAC 4901-1-12.

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PUCO

Respectfully,


Erin Dahl, Plaintiff-Pro se
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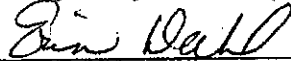
FACTS and MOTION REQUEST

1. On August 22, 2017, I, Erin Dahl filed my 3rd complaint with the Public Utilities Commission of Ohio, in which I allege that Dominion East Ohio's billing for my gas service, which was both inaccurate and fraudulent. Prior to filing this 3rd complaint with the PUCO, I scheduled two separate Meter Tests. During each of the scheduled tests the technician for Dominion did not follow the protocol, which is governed and whose directives are detailed in the Ohio Revised Statutes and Administrative Codes.
2. A telephonic settlement conference was scheduled and took place on June, 20, 2018, at 1:30 p.m. Eastern Time. All parties to the case attended the telephonic conference, however, the parties could not agree upon a resolution.
3. A hearing in this matter was ordered and scheduled for August 30, 2018, at 10:00 a.m., in the offices of the Commission, Hearing Room 11_A, 11th Floor, 180 East Broad Street, Columbus, Ohio 43215-3793.
4. Due to both court obligations in Arizona, which was scheduled for October 8, 2018, and Dominion Gas Company's refusal to issue my billing statements, which were/are needed for the PUCO hearing, a Motion for Continuance was filed and granted by the PUCO court. The hearing was now rescheduled for November 9, 2018.
5. I returned to Cleveland on October 28, 2018, for my job here, the pending legal issues, which include the PUCO hearing and to be with my Mother. Upon my return I had still not received the promised billing statements from Dominion or it's legal counsel. Due to that, I immediately filed for a Continuance for the November 9, 2018 hearing, which is also the date my Mother unexpectedly passed away.
6. On November 2, 2018, Andrew Campbell of Whitt-Sturtevant, responded to my request by addressing a letter to the PUCO court. In the letter he did not object to my request for a Continuance, and only requested that the hearing be scheduled for January or later. He also responded to the fact stated in my Motion for Continuance, that he mailed the billing statements that I had been requesting from Dominion for over a year, but had never received, despite Dominion's and the counsel for Whitt-Sturtevant's repeated claims that they were sent to me. The PUCO granted my request for a Continuance and rescheduled the hearing for January 31, 2019.
7. On December 18, 2018, I filed a Motion with the PUCO requesting for the court to order the release of the billing statements. Despite Andrew Campbell's claim on November 2, 2019, that he mailed them, I still had not received them as of that date, and need(ed) them to prepare for the hearing. Scheduled for January 31, 2019. Rebekah Glover of Whitt-Sturtevant responded to my motions by

e-mail. I filed her responses and our correspondences on January 4, 2019 and January 8, 2019, in which she claimed that she was mailing the requested documents/billing statements.

8. On January 12, 2019, I finally received the Dominion billing statements to my P.O. Box in South Euclid, Ohio, for which I had been requesting for over a year. Due to this delay, caused by Dominion's and its legal counsel's repeated refusal to issue these statements despite their repeated claims, and I have not had adequate time to prepare for the hearing in the 2 and a half week time-frame which remains before the hearing, caused by these unnecessary and deliberate delays of not having access to the billing statements.
9. As such, Good Cause exists, and I am filing one last request with the PUCO for a 30-day Continuance for the hearing so that I can adequately prepare, based on the billing documentation that I just received from Whitt-Sturtevant. As all of the formal complaints prove, as well as each Motion that I have filed with the PUCO regarding these various circumstances, I have been extremely diligent in pursuing this case, and timely in every situation, but have had limited control and various obstacles and constraints due to litigation in Arizona and Dominion's withholding of these documents. I have been trying to prepare the last week after having finally received the documents, but it is insufficient time, and the delay was not caused by me. My Mother was the primary reason that I returned to work in Ohio, however, the pending legal issues were also a factor. After her passing on November 9, 2019, I have made the decision to stay here to contend with these issues in Ohio, which include, but are not limited to the hearing with PUCO. As Good Cause exists, I respectfully request for the court to grant my Motion for Continuance based on OAC 4901-1-12 as the current delay, was not caused by any neglect on my part or as the main party/Complainant to this case.

Respectfully submitted (January 21, 2019)



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CERTIFICATE OF SERVICE

CASE NUMBER: 17-1822-GA-CSS

CASE DESCRIPTION: Erin Dahl vs. Dominion East Ohio

DATE OF SERVICE: January 21, 2019

DOCUMENT SIGNED ON: January 21, 2019

This document titled Motion for Continuance has been served to all parties to the case by fax to the PUCO for filing with the PUCO Docketing Information System.

PARTY OF RECORD

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