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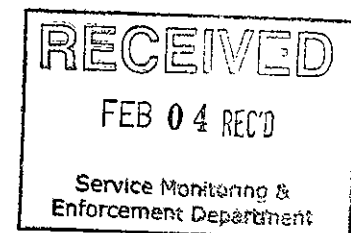
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Subject: RESPONSE TO DEU'S MEMORANDUM CONTRADICTION FOR
CONTINUANCE

To: THE PUCO - ATTORNEY EXAMINER

Phone: 614-466-3452

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From: ERIN DAHL

Phone: (216) 816-7989

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No. of pages: 5 including

Message: FOR CASE No. 17-1822-GA-CSS

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ERIN DAHL,

-Complainant

v.

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

-Respondant

Case No. 17-1822-GA-CSS

**RESPONSE TO DEO'S
MEMORANDUM CONTRA MOTION FOR CONTINUANCE OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

I. INTRODUCTION

On February 22, 2019, Rebekah Glover, counsel for Dominion East Ohio Gas, filed a response to my Motion for a Continuance which I, Erin Dahl, filed on February 21, 2019, in accordance with OAC 4901-1-12. In accordance with OAC 4901-1-12(b)(1) this response is being filed for consideration against DEOs Memorandum Contra my Motion.

II. ARGUMENT

The argument made by the counsel Dominion East Ohio Gas is an insufficient reason on which to deny my request for a two-week Continuance. Counsel argues that I have been provided multiple chances to prosecute this case and have failed to do so.

Each Continuance was either requested due to conflicting court dates for other circumstances in litigation, of which I have/had no control over, or the extenuating circumstance of the death of my mother and my relocation here for those purposes. Then, of course, the final request for a

Continuance, which was due to the failure of Dominion East Ohio and their respective counsel, to provide the required documents that are part of and needed for this case.

As my property was stolen a week ago today, I have made every effort with the South Euclid Police Department to resolve this issue as quickly as possible, so that I would not have to file another Continuance with the PUCO court. This is the reason for filing it mid-week, as I tried to avoid it altogether, as I am aware of the contingency upon which the last Continuance was granted. I have provided to the court how this theft and the untimely resolution of the theft by the Police Department (due to having to obtain a subpoena) impacts my circumstances for the hearing scheduled for February 25, 2019, both of which I have no control over, and for good cause, make this request to the court.

As such, I respectfully ask the Attorney Examiner to grant this two-week extension to the hearing. Throughout the history of my complaints to Dominion and later to the PUCO, the record shows that numerous delays have been caused by Dominion and its counsel, either by providing misinformation (Dominion), calls not being returned (Dominion), or records not being reissued despite request after request for them (Dominion and its counsel). I should have been able to resolve these issues in 2017 with Dominion directly and without bringing the problems to the Public Utilities Commission of Ohio. Rebekah Glover's repeated claims that these delays cause an undue hardship upon Dominion and its counsel is false. From the inception of these billing and usage problems with Dominion East Ohio, and my subsequent allegations, the undue hardship has been placed on me. I have not filed a single Motion for Continuance based on any negligence on my part, and each request not only fell and falls within the scope of the various laws and statutes that govern the process, but each request has been undeniably substantiated.

III. CONCLUSION

As good cause exists, I regrettably, yet respectfully, ask the court for this Continuance. The arguments put forth by DEO's counsel are at times false, yet almost always misleading and do not provide a basis upon which to deny my request. The delays affect me adversely and also impact other processes in my life. I do not take the requests or the delays lightly, nor the time and effort the court must put forth to review and to make a ruling on them. However, the complaint that I filed with the PUCO is true and can be legally substantiated and it is for these reasons I respectfully ask the court to grant this Motion for Continuance.

Respectfully submitted,

/s/ Erin Dahl



Erin Dahl

Complainant, Pro se

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CERTIFICATE OF SERVICE

CASE No.: 17-1822-GA-CSS

CASE DESCRIPTION: ERIN DAHL V. DOMINION EAST OHIO

DATE OF SERVICE: FEBRUARY 23, 2019

DOCUMENT SIGNED ON: FEBRUARY 23, 2019

I hereby certify that this document titled *Motion for Continuance* has been served to all parties to the case by e-mail and by fax for filing with the Public Utilities Commission of Ohio's Docketing Information System:

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