

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 18-1908-GA-UNC
Ohio re: Implementation of the Tax Cuts and)
Jobs Act of 2017.)

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 18-1909-GA-ATA
Ohio for Approval of Tariff Revisions.)
)

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy)
Ohio for Authority to Revise Its Depreciation) Case No. 19-1639-GA-AAM
Accrual Rates and to Amortize Its Reserve)
Imbalance.)

**MOTION AND MEMORANDUM IN SUPPORT
FOR STAY OF BRIEFING SCHEDULE
AND REQUEST FOR EXPEDITED RULING**

In accordance with O.A.C. 4901-1-13, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company) requests an immediate and indefinite stay of the briefing schedule in Case Nos. 18-1908-GA-UNC and 18-1909-GA-ATA (the TCJA case). Under the current schedule, initial briefs in the TCJA case are due November 5, 2019, and reply briefs are due November 26, 2019. On October 31, 2019, however, DEO, Commission Staff, and the Office of the Ohio Consumers' Counsel (OCC) filed a Stipulation and Recommendation (Stipulation) in the TCJA case and in Case No. 19-1639-GA-AAM (the Depreciation case), which resolved all issues presented in these proceedings. Given the filing of the Stipulation, the parties to the TCJA case agree that the scheduled post-hearing briefing is unnecessary at this time, pending the Commission's approval of the Stipulation. Given the imminent due date for initial briefs in the TCJA case, DEO requests that this motion be granted on an expedited basis. DEO has contacted Staff, OCC, and the Retail Energy Supply Association (RESA). No party opposes DEO's request for a stay of the briefing schedule and for expedited treatment.

The Signatory Parties to the Stipulation agreed that “the approval of these applications and this Stipulation will not increase rates, that sufficient evidence and documentation of all facts relevant to these applications and this Stipulation have been provided to Staff and to the Signatory Parties, and that a hearing is not necessary in this case.” (Stipulation at ¶ 7) DEO, however, recognizes that O.A.C. 4901-1-30(D) requires “the testimony of at least one signatory party that supports the stipulation.” Therefore, DEO also requests that an Entry be issued requiring that any testimony concerning the Stipulation be filed no later than November 12, 2019. This timetable is consistent with the condition in the Stipulation that the Commission issue an order by year-end as set forth in the Stipulation. No party to these proceedings opposes DEO’s request. DEO also plans to promptly seek a waiver of cross-examination of any Stipulation-related testimony to confirm with the Attorney Examiners by November 13, 2019, or as soon as possible thereafter, that a hearing is not necessary in any of these proceedings.

For the foregoing reasons, DEO respectfully requests that the Commission issue an entry granting DEO’s Motion on an expedited basis, requesting a stay of the briefing schedule in the TCJA case and an Entry requiring any testimony concerning the Stipulation be filed no later than November 12, 2019.

Dated: November 4, 2019

Respectfully submitted,

s/ Christopher T. Kennedy

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by electronic mail upon the following individuals on November 4, 2019:

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/s/ Christopher T. Kennedy
One of the Attorneys for The East Ohio Gas
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Case No(s). 18-1908-GA-UNC, 18-1909-GA-ATA, 19-1639-GA-AAM

Summary: Motion Motion and Memorandum in Support for Stay of Briefing Schedule and Request for Expedited Treatment electronically filed by Mr. Christopher T Kennedy on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio