BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Investigation of The East)
Ohio Gas Company d/b/a Dominion Energy)
Ohio Relative to its Compliance with the)
Natural Gas Pipeline Safety Standards and)
Related Matters.

JOINT MOTION FOR THIRD EXTENSION OF TIME

By Entry dated December 18, 2019, the Commission directed Staff to prepare a report with respect to a gas incident that occurred in November 2019 in Pepper Pike, Ohio. The Entry also directed Dominion Energy Ohio (DEO) to "respond in writing to the staff investigate report within 30 days of its filing."

Staff filed its report on February 28, 2020. The 30-day period to respond ended on March 30, 2020. On March 17, Dominion and Staff jointly requested an extension to respond to the Staff Report by April 29, 2020. The Commission granted that extension on March 24. On April 24, 2020, Dominion and Staff jointly requested a second extension to respond to the Staff Report by May 29, 2020. The Commission granted that extension on April 28.

DEO and Staff now request an additional extension of two weeks of the deadline to respond to the Staff Report. DEO and Staff have discussed the findings and recommendations and continue to work toward resolving them. Both parties, however, have also had to divert resources to implementing the Governor's Executive Orders regarding the COVID-19 pandemic. An additional two weeks will enable DEO and Staff to continue their dialogue about the Staff Report while also addressing an ever-evolving public health crisis.

Accordingly, DEO and Staff respectfully request an additional extension of two weeks, or until June 12, 2020, for DEO to respond to the Staff Report.

Dated: May 28, 2020 Respectfully submitted,

/s/ Christopher T. Kennedy
Mark A. Whitt (0067996)
Christopher T. Kennedy (0075228)
Lucas A. Fykes (0098471)
WHITT STURTEVANT LLP
88 East Broad Street, Suite 1590
Columbus, Ohio 43215
Telephone: (614) 224-3911
whitt@whitt-sturtevant.com
kennedy@whitt-sturtevant.com
fykes@whitt-sturtevant.com

Andrew J. Campbell (0081485)
DOMINION ENERGY, INC.
88 East Broad Street, Suite 1303
Columbus, Ohio 43215
Telephone: (614) 601-1777
andrew.j.campbell@dominionenergy.com

(All counsel willing to accept service by email)

Attorneys for The East Ohio Gas Company d/b/a Dominion Energy Ohio

/s/ Werner L Margard per e-mail authorization Werner L. Margard (0024858) Ohio Attorney General, Public Utilities Section 30 E. Broad Street, 16th Floor Columbus, OH 43215 Telephone: (614) 995-5532 werner.margard@ohioattorneygeneral.gov

Attorney for the Staff of the Public Utilities Commission of Ohio

CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing pleading was served by electronic mail this 28th day of May, 2020 to the following:

/s/ Christopher T. Kennedy
One of the Attorneys for The East Ohio
Gas Company d/b/a Dominion Energy
Ohio

werner.margard@ohioattorneygeneral.gov Robert.Fadley@puco.ohio.gov Thomas.Stikeleather@puco.ohio.gov

Attorney Examiner:

<u>Lauren.Augostini@puco.ohio.gov</u> <u>Matthew.Sandor@puco.ohio.gov</u> This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/28/2020 9:04:33 AM

in

Case No(s). 19-2140-GA-GPS

Summary: Motion Joint Motion for Third Extension of Time electronically filed by Mr. Christopher T Kennedy on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio