

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company's Compliance with R.C. 4928.17 and the Ohio Adm.Code 4901:1-37.

Case No. 17-974-EL-UNC

**MOTION TO EXTEND THE COMMENT PERIOD AND PROCEDURAL SCHEDULE
AND REQUEST FOR EXPEDITED RULING OF INTERSTATE GAS SUPPLY, INC.**

Pursuant to Ohio Adm.Code 4901-1-13, Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") respectfully moves to modify the comment period and procedural schedule in the above-captioned proceeding. This additional time will provide parties with the opportunity to adequately develop their positions. Specifically, IGS proposes the following modifications:

Initial Comments	November 8, 2021
Reply Comments	November 22, 2021
Deadline for the service of discovery, except for notices of deposition	November 24, 2021
Companies' Testimony	January 13, 2022
Intervenor Testimony	January 27, 2022
Evidentiary Hearing	Around February 10, 2022, subject to availability of the Attorney Examiners

Additionally, IGS recommends that the Attorney Examiners set a prehearing conference for this proceeding, subject to their availability, the week of December 6, 2021.

IGS contacted the parties to this case and certifies that no party opposes an expedited ruling on this Motion. Accordingly, IGS requests that the Commission grant this Motion under Ohio Adm. Code 4901-1-12(C) on an expedited basis for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Bethany Allen

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

In this proceeding, the Commission ordered an additional audit to ensure compliance with Ohio's corporate separation requirements by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the "Companies") and their affiliates during the time period leading up to the passage of Am. Sub. H.B. 6 ("H.B. 6") and the subsequent referendum.¹ This case is one of multiple proceedings currently before the Commission examining the conduct of FirstEnergy Corp. and the Companies surrounding the passage of H.B. 6, which has added a layer of complexity to the discovery process and the development of positions. Thus, in order to have sufficient time to develop comments that will adequately assist the Commission in its review of this case, IGS respectfully requests an extension of the comment period and procedural schedule for the reasons set forth below.

II. ARGUMENT

On September 13, 2021, the second Audit Report was filed in this proceeding. Subsequently, on September 17, 2021, the Attorney Examiner established a comment

¹ Entry (Nov. 4, 2020) at ¶ 1, 17.

period and procedural schedule. Specifically, the Entry directs all interested parties to file initial and reply comments regarding the auditor's report by October 14, 2021, and October 29, 2021, respectively. Additionally, the Entry established the following procedural schedule: deadline for the service of discovery on November 1, 2021; Companies' testimony by December 7, 2021; Intervenor testimony by December 21, 2021; and an evidentiary hearing convening on January 4, 2022.

Consistent with Ohio Adm.Code 4901-1-13(A), good cause exists to grant this motion. As noted above, this case's entwinement with other open proceedings has added a layer of complexity to the development of the parties' positions. For example, the Attorney Examiner recently granted the Companies' request for a two-week extension to comply with discovery requests in a different H.B. 6 related proceeding. In response, the Office of the Ohio Consumers' Counsel requested a complementary two-week extension for the filing of comments in this proceeding, noting that it intends on relying on those responses for the development of comments in this proceeding. In addition, as it is currently scheduled, the Initial Comments in this proceeding are due on the same day as the Reply Comments in a different H.B. 6 related proceeding.²

Granting this extension is necessary to provide parties an opportunity to adequately conduct and review discovery, as well as have time to fully develop their positions in this case. Ultimately, this will contribute to the presentation of a full and complete record to the Commission regarding these important issues.

² See *In the Matter of the 2020 Review of the Delivery Capital Recovery Rider of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company*, Case No. 20-1629-EL-RDR, Entry (Aug. 27, 2021) at ¶ 17; Entry (Mar. 10, 2021) at ¶ 9 ("This is the fourth investigation initiated by the Commission related to the allegations surrounding FirstEnergy Corp.").

Finally, pursuant to Ohio Adm.Code 4901-1-12(C), IGS requests an expedited ruling on this motion. IGS contacted all parties to this case and certifies that no party opposes an expedited ruling on this Motion.

Therefore, IGS Energy respectfully seeks an extension to the comment period and procedural schedule on an expedited basis. Specifically, IGS proposes the following modifications:

Initial Comments	November 8, 2021
Reply Comments	November 22, 2021
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Additionally, IGS recommends that the Attorney Examiners set a prehearing conference for this proceeding, subject to their availability, the week of December 6, 2021.

III. CONCLUSION

For all the reasons discussed above, IGS Energy respectfully requests that this motion be granted on an expedited basis. The extension is necessary to provide parties an opportunity to adequately conduct and review discovery and develop positions in order to provide the Commission with a full and complete record for its review of these important issues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this document was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on October 1, 2021. The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties listed below.

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/1/2021 1:11:03 PM

in

Case No(s). 17-0974-EL-UNC

Summary: Motion Motion to Extend the Comment Period and Procedural Schedule and Request for Expedited Treatment of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.