BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

RICHARD MOLDAS (RPM)
ENGINEERING, LLC))
)
)
Complainant,)
)
V.)
VECTREN ENERGY DELIVERY OF	
)
OHIO, INC. D/B/A CENTERPOINT)
ENERGY OHIO	

Case No. 21-1202-GA-CSS

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING AND REQUEST FOR EXPEDITED TREATMENT OF VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO

In accordance with Ohio Adm.Code 4901-1-12, 4901-1-13 and 4901-9-01, Vectren

Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio (CEOH or the Company)

respectfully requests a two-week extension of time to file a responsive pleading in this case until

January 3, 2022. Good cause exists to grant this motion, which is detailed below.

On November 29, 2021, the Complainant filed his complaint, and on November 30, 2021,

the Commission served the complaint upon CEOH. CEOH is presently working with Mr. Moldas

to resolve his complaint. Despite the Company's best efforts, these discussions will not be

completed in time to file either an answer or a statement indicating the complaint has been

satisfied by the current due date of December 20, 2021.

To allow CEOH additional time to ascertain whether it will be able to satisfy Mr.

Moldas's complaint, CEOH requests an extension of the due date for its responsive pleading

until January 3, 2022. CEOH represents that Mr. Moldas does not object to this request. The

Company further represents that this request is not being made for the purposes of delay and requests expedited treatment of this motion in accordance with Ohio Adm.Code 4901-1-12(C).

For the foregoing reasons, CEOH respectfully requests that the Commission grant its request for an extension of time to file a responsive pleading until January 3, 2022, on an expedited basis.

Dated: December 15, 2021

Respectfully submitted,

/s/ Christopher T. Kennedy Mark A. Whitt (0067996) Christopher T. Kennedy (0075228) Lucas A. Fykes (0098471) WHITT STURTEVANT LLP The KeyBank Building, Suite 1590 88 East Broad Street Columbus, Ohio 43215 Telephone: (614) 224-3912 whitt@whitt-sturtevant.com kennedy@whitt-sturtevant.com fykes@whitt-sturtevant.com

(All counsel willing to accept service by email)

ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time to File

Responsive Pleading and request for Expedited Treatment was served by mail to the following

persons this 15th day of December, 2021:

Richard Moldas RPM Engineering LLC 101 Belle Pines Ct. Bellefontaine, OH 43311

/s/ Lucas A. Fykes

One of the Attorneys for Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio

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in

Case No(s). 21-1202-GA-CSS

Summary: Motion Motion for Extension of Time to File Responsive Pleading and Request for Expedited Treatment electronically filed by Christopher T. Kennedy on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio