

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Northeast Ohio Natural Gas Corp. for an Increase in Gas Distribution Rates)	Case No. 23-0154-GA-AIR
)	
In the Matter of the Application of Northeast Ohio Natural Gas Corp. for Tariff Approval)	Case No. 23-0155-GA-ATA
)	
In the Matter of the Application of Northeast Ohio Natural Gas Corp. for Approval of an Alternative Rate Plan)	Case No. 23-0156-GA-ALT
)	

**UNOPPOSED MOTION TO MODIFY THE PROCEDURAL SCHEDULE AND
REQUEST FOR EXPEDITED RULING**

Northeast Ohio Natural Gas Corp. (“NEO” or “Company”), in accordance with Rule 4901-1-12 and Rule 4901-1-13, respectfully requests a revised case schedule extending all remaining scheduled dates to allow additional settlement discussions. Specifically, NEO requests that the deadline for filing testimony on behalf of the Staff of the Commission (“Staff”) be changed from December 5, 2023, to January 16, 2024. NEO also requests the evidentiary hearing be rescheduled from December 12, 2023, to a date on or after January 23, 2024. As the current procedural schedule contemplates the filing of Staff testimony by December 5, 2023, NEO requests expedited treatment of this motion.

NEO has discussed this extension request with all parties to the case, and there is no opposition to either the extension or the expedited treatment of this request.

For the reasons more fully set forth in the attached memorandum in support, NEO respectfully requests that the Commission grant this motion on an expedited basis in accordance with Rule 4901-1-12(C). The undersigned certifies that no party objects to the issuance of such a ruling.

Respectfully submitted,

/s/ N. Trevor Alexander

N. Trevor Alexander (0080713)

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**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION TO MODIFY THE
PROCEDURAL SCHEDULE AND REQUEST FOR EXPEDITED RULING**

On October 10, 2023, the Attorney Examiner issued an Entry establishing the current procedural schedule. NEO hereby requests that the deadline for the filing of Staff testimony be changed from December 5, 2023, to January 16, 2024. NEO also requests the evidentiary hearing be rescheduled from December 12, 2023, to a date on or after January 23, 2024.

Pursuant to Rule 4901-1-13(A), the extension of deadlines is permitted for good cause shown. Good cause exists here because progress has been made through settlement discussions, but the parties have not yet been able to resolve the pending issues. NEO believes that an additional period of time is necessary, reasonable, and in the best interests of all stakeholders, as an extension may result in the efficient resolution of all issues in this case. Further, NEO represents that it is declining to implement the requested increase in rates, pursuant to R.C. 4909.42, should the parties go beyond the 275-day period.

Granting this motion will provide an opportunity for the parties to continue settlement discussions and mutually resolve the contested issues in this case without having to put the

Commission, its Staff, and all other parties through an evidentiary hearing that could have been avoided. No party will be prejudiced if the motion is granted.

Expedited treatment is necessary for this motion because the deadline for Staff to file testimony is imminent. None of the parties to this proceeding object to the additional time or the expedited treatment request herein. Accordingly, NEO respectfully requests that the Commission grant this motion and establish a revised procedural schedule as set forth herein.

Respectfully submitted,

/s/ N. Trevor Alexander

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on December 1, 2023 upon the parties listed below.

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/s/ Kari D. Hehmeyer

Kari D. Hehmeyer

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in

Case No(s). 23-0154-GA-AIR, 23-0155-GA-ATA, 23-0156-GA-ALT

Summary: Motion Unopposed Motion to Modify Procedural Schedule and Request for Expedited Ruling and Memorandum in Support electronically filed by Ms. Kari D. Hehmeyer on behalf of Northeast Ohio Natural Gas Corp..