

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application to Modify,)
in Accordance with R.C. 4929.08, the) Case No. 12-2637-GA-EXM
Exemption Granted Columbia Gas of Ohio,)
Inc., in Case No. 08-1344-GA-EXM.)

JOINT REPLY IN SUPPORT OF JOINT MOTION FOR EXTENSION

The Retail Energy Supply Association, Interstate Gas Supply, Inc., Dominion Energy Solutions, Inc., Direct Energy Services, LLC, Direct Energy Business, LLC, Stand Energy Corporation and Volunteer Energy Services, Inc. submit this joint reply in response to the memorandum contra filed by the Office of the Ohio Consumers Counsel.

OCC states at page 4 of its memorandum contra that “[t]he Settlement should continue, pursuant to its terms, until the PUCO orders otherwise.” That is the point of the extension motion - that the PUCO should formally continue the stipulation to December 31, 2018. As stated in the extension motion, doing so will provide certainty while the Parties negotiate possible next steps with Columbia’s exemption.

OCC wrongly claims at page 2 of its memorandum contra that the extension motion is seeking to have the stipulation expire at the end of December 31, 2018. The extension motion is not seeking to have the stipulation expire as of December 31, 2018, but simply seeks to change the reference in the stipulation from March 31, 2018 to December 31, 2018. If the extension is granted, the language in the stipulation stating that the provisions of the stipulation would “continue until modified by the Commission unless otherwise stated” would remain in place. OCC can rest assured that if negotiations are not successful or timely, the stipulation will not end or expire as of December 31, 2018.

OCC also claims at page 4 of its memorandum contra that the extension motion would impose a “non-binding” deadline of October 15, 2018 to use best effort to reach a negotiated solution. OCC is wrong. As is clear from the motion for extension, it simply notifies the PUCO of the agreement and the movants’ commitment to each other to use best efforts to try and reach a negotiated solution by October 15, 2018. That agreement does not implicate OCC, and there was no request that the PUCO act on that agreement.

The request for certainty while negotiations are taking place is reasonable. The extension motion is requesting that the Commission expressly extend the Amended Joint Stipulation and Recommendation through December 31, 2018, so that all the terms in effect as of March 31, 2018, continue uninterrupted through December 31, 2018, with the agreed-upon capacity levels updated for Columbia’s capacity contracts in effect on April 1, 2018, and any capacity contract updates through December 31, 2018. Doing so will provide certainty while negotiations take place on possible next steps with Columbia’s exemption proceeding.

Respectfully submitted,

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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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 17th day of September, 2018, upon the parties listed below.

/s/ Gretchen L. Petrucci
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