

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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**JOINT MOTION FOR EXTENSION**

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Pursuant to Ohio Adm. Code 4901-1-12(C), 4901:1-19-02(D) and 4901:1-19-11(A), Columbia Gas of Ohio, Inc., Staff of the Public Utilities Commission of Ohio, 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. (collectively, the "Movants") respectfully request an extension through December 31, 2018, of the Amended Stipulation and Recommendation filed in the above-referenced proceedings on November 27, 2012, as approved by the Commission in an Opinion and Order dated January 9, 2013, and as further modified by its Entry on Rehearing dated March 20, 2013. The Movants seek this extension because they are currently negotiating the possible next steps to follow Columbia's above-referenced exemption proceedings. A memorandum in support of this joint motion is attached.

Respectfully submitted,

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## MEMORANDUM IN SUPPORT

By an Opinion and Order issued in Case No. 08-1344-GA-EXM, dated December 2, 2009, the Commission granted Columbia Gas of Ohio, Inc. (“Columbia”) an exemption, pursuant to R.C. § 4929.04, authorizing Columbia to eliminate its gas cost recovery mechanism and replace it with a commodity auction process. On November 27, 2012, Columbia along with Commission Staff, Office of the Ohio Consumers’ Counsel,<sup>2</sup> Ohio Gas Marketers Group, Retail Energy Supply Association, and Dominion Retail, Inc. requested a modification of the Commission’s Orders approving Columbia’s exemption and presented an Amended Joint Stipulation and Recommendation, which was approved by the Commission by Opinion and Order dated January 9, 2013.

Certain Movants allege there is some uncertainty as to what provisions continue in the Amended Joint Stipulation and Recommendation after March 31, 2018. However, the Movants are working towards a negotiated solution to resolve their differences. Therefore, the Movants are requesting that the Commission expressly extend the Amended Joint Stipulation and Recommendation, through December 31, 2018<sup>3</sup> so that all the terms in effect as of March 31, 2018, continue uninterrupted through December 31, 2018,<sup>4</sup> 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. This extension would provide certainty while the Parties negotiate possible next steps with Columbia’s commodity exemption proceeding.<sup>5</sup>

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<sup>2</sup> OCC joined the provisions of the Amended Stipulation and Recommendation that related to residential customers and took other numerous positions with regard to the Amended Stipulation and Recommendation.

<sup>3</sup> The Movants agree that the Commission’s disposition of this Motion to Extend is not a Commission action that modifies the ongoing Amended Stipulation and Recommendation, as is noted in the following Amended Stipulation language: “After [March 31, 2018], the provisions of this Amended Stipulation including the then-approved method of supplying commodity for standard service offer and Standard Choice Offer (“SCO”) service shall continue until modified by the Commission unless otherwise stated herein.” Further, Columbia’s joining this motion shall not compromise Columbia’s position that the Amended Stipulation and Recommendation continues automatically pursuant to the terms of that agreement.

<sup>4</sup> The Movants agree that the “five-year term” and similar phrases in the Amended Stipulation and Recommendation shall be updated to December 31, 2018.

<sup>5</sup> Nothing in this motion shall be construed to preclude or limit the rights of the Movants to take positions regarding the issues raised in this proceeding in the future or any other proceeding including, but not limited to, capacity contract levels and costs.

The Movants agree to use best efforts to reach a negotiated solution in order to present it to the Commission by October 15, 2018. The Movants intend to meet regularly (generally to be held every two weeks) to hold discussions on the issues. If a fully negotiated solution is not reached by October 15, 2018, the Movants will provide an update to the Commission through a filing in this docket.

For all of these reasons, as permitted by Ohio Adm. Code 4901-1-12(C), 4901:1-19-02(D) and 4901:1-19-11(A), the Movants respectfully request an extension through December 31, 2018, of the Stipulation filed in the above-referenced proceeding on October 4, 2012, as approved by the Commission in an Opinion and Order dated January 9, 2013, and as provided herein.

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 24th day of August, 2018, upon the parties listed below.

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