FILED March 26, 2024 INDIANA UTILITY REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

# APPLICATION OF BOONVILLE NATURAL GAS ) CORPORATION FOR AUTHORITY TO INCREASE ) RATES AND CHARGES THROUGH THE SMALL ) UTILITY PROCEDURE PURSUANT TO IND. CODE ) § 8-1-2-61.5 AND 170 IAC 14-1-1 ET SEQ. )

**CAUSE NO. 45985 U** 

# INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S MOTION FOR EXTENSION OF TIME TO FILE REPORT

The Indiana Office of Utility Consumer Counselor ("OUCC"), by counsel, respectfully requests an extension of time to file the OUCC's Report in this Cause, as required under 170 IAC 14-1-4, due to inconsistencies between the gas commodity sales volumes Boonville Natural Gas Corporation ("Applicant" or "Boonville") reported for purposes of this proceeding and those approved in Applicant's Gas Cost Adjustment ("GCA") filings.

To reconcile and determine the sales volumes and related amounts that will be used in this Small U filing, a meeting was held among the OUCC, the Indiana Utility Regulatory Commission's (the "Commission") Energy Division, and Boonville on March 19, 2024, at which the OUCC learned how Boonville proposes to resolve these discrepancies for purposes of this Cause. Such resolution, along with corrected documentation from Boonville, are needed to prepare the OUCC's Report and for consideration of this Small U filing. Based on discussions at the meeting, Boonville will be filing revised information on April 1, 2024. In further support of this motion, the OUCC states:

1. Boonville filed its Application for Authority to Change its Rates and Charges through the Small Utility Procedure on November 22, 2023.

- The OUCC is currently scheduled to file its Report in this Cause on March 27, 2024.
- During informal discovery, the OUCC determined Boonville's gas commodity sales volumes presented in this Cause do not match the sales volumes presented in Boonville's GCA filings.
- Boonville stated the sales volume discrepancies were due to its billing software being limited in temporal scope and that it reconciles discrepancies in dollar amounts, but not in volume amounts.
- 5. After inquiring of Boonville about the discrepancies in Boonville's schedules and workpapers, the March 19, 2024, meeting referenced above was held to discuss and address Applicant's sales volume discrepancies.
- Following the March 19 meeting, Boonville confirmed its plan to provide the Commission and the OUCC with supplemental documents on or before April 1, 2024, reflecting the corrections needed.
- 7. The OUCC needs sufficient time after receipt of Boonville's supplemental documents to review this material and prepare the OUCC's Report based on the appropriate sales volumes. If inaccuracies remain, Applicant may also need time to further revise its Small U filing.

Given the matters described above, the challenges to date in securing accurate information, and the OUCC's need for additional time to prepare its Report after the sales volume discrepancies are resolved, the OUCC respectfully requests that the deadline to file its Report be extended from March 27, 2024, to and including May 3, 2024. The OUCC notified Applicant's counsel that it

will seek this extension through May 3, 2024, but has not been able to ascertain Applicant's position on this motion prior to filing.

WHEREFORE, the OUCC respectfully moves the Commission to grant this Motion by extending the filing date for the OUCC's Report to and including May 3, 2024, and for such further relief as the Commission deems appropriate.

Respectfully submitted,

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Adam J. Kashin Attorney No. 37960-49 Deputy Consumer Counselor

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served upon the following counsel

of record in the captioned proceeding by electronic service on March 26, 2024.

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