**BEFORE THE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Review of the Smart Grid Modernization Initiative Contained in the Tariffs of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company | )  )  )  )  )  ) | Case No. 12-0406-EL-RDR |

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**MOTION FOR A STAY OF THE PROCEDURAL SCHEDULE AND**

**REQUEST FOR AN EXPEDITED RULING**

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Pursuant to Sections 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the “Companies”) respectfully request a stay of the procedural schedule in this matter for purposes of providing parties time to attempt to reach settlement. The parties intend to meet on or about August 28, 2013 in an effort to discuss the facts surrounding this matter and to determine if there is either any common ground upon which the parties can agree, or a mutually agreeable solution that would avoid the necessity of hearing. If no such solution can be reached, the parties will provide the attorney examiner with a revised procedural schedule for her consideration shortly thereafter.

Inasmuch as the current procedural schedule requires the Companies to file their testimony in this matter by August 19, 2013, the Companies further request that an expedited ruling on this motion be issued pursuant to OAC Section 4901-1-12(C). Counsel for the Companies has been authorized to represent to the Commission that neither Staff nor the Office of the Ohio Consumers’ Counsel – the only other parties currently involved in this matter -- opposes this request.

Under OAC 4901-1-13(A), continuances and extensions of time “may be granted upon motion of any party for good cause shown.” The Companies submit that the requisite good cause exists here. Specifically, the efforts of the parties to find common ground are in the interest of all involved, resulting in judicial economy and a savings of time and resources for all parties. Accordingly the Companies respectfully request that this motion be granted consistent with the requests made herein.

Respectfully submitted,

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|  | */s/ Kathy J. Kolich*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Kathy J. Kolich (0038855)  FIRSTENERGY SERVICE COMPANY  76 South Main Street  Akron, OH 44308  (330) 384-4580  (330) 384-3875 (fax)  kjkolich@firstenergycorp.com  Colleen M. O’Neil (0066576)  CALFEE, HALTER & GRISWOLD LLP  The Calfee Building  1405 East 6th Street  Cleveland, OH 44114  (216) 622-8200  (216) 241-0816 (fax)  coneil@calfee.com  *Attorneys for Applicants Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company* |

**CERTIFICATE OF SERVICE**

I hereby certify that this Motion for a Stay of the Procedural Schedule and Request for an Expedited Ruling submitted by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company was filed electronically this 15th day of August, 2013, with the Public Utilities Commission of Ohio Docketing Information System. Notice of this filing will be sent via e-mail to all current parties of record.

*/s/ Kathy J. Kolich*

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