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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of)
Chapters 4901:1-9, 4901:1-10, 4901:1-21,)
4901:1-22, 4901:1-23, 4901:1-24, and 4901:1-25)
of the Ohio Administrative Code.)

Case No. 06-653-EL-ORD

JOINT MOTION FOR TECHNICAL CONFERENCE
AND TO MODIFY PROCEDURAL SCHEDULE

EXPEDITED RULING REQUESTED

The Commission, on April 4, 2007, presented the Staff's proposed changes regarding seven chapters of the Commission's rules. The Commission established May 18, 2007 and June 8, 2007 as dates for filing initial comments and reply comments, respectively. While the Entry summarized a few "of the more significant recommended changes" (Entry, p. 2, ¶3), there is no discussion which sheds light on why those changes, or the other changes included in the 169 page attachment to the Entry, have been proposed.

While the reasoning for some changes may be obvious, the reasoning and what Staff is hoping to accomplish through many other of the changes are not. In order to assist commenting parties' understanding of the reasoning behind the proposed changes and, therefore, enable those parties to submit more meaningful comments that address Staff's concerns, the undersigned parties request that the Commission convene a technical conference during which parties can discuss the reasons for proposed changes.

The undersigned parties are not looking to debate proposed changes at the technical conference. The debate, if any, will be contained in filed comments. We simply seek to better understand why particular changes are being proposed so that our filed comments can speak to the

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Staff's concerns. Without this opportunity to hear from the Staff, parties will be left to assume the bases for the proposed changes. Consequently, the quality of our comments, and the Commission's ultimate deliberation in this proceeding, will suffer.

In conjunction with this request for a technical conference, the undersigned parties request that the procedural schedule for filing comments be modified. There should be at least a 30-day period for filing initial comments after the technical conference. After initial comments are filed, regardless of whether a technical conference is held, parties should be given a 45-day period to respond to what is anticipated to be many sets of comments which not only address the proposed changes, but which contain new proposals by the parties. In light of the anticipated volume of material to be reviewed in the initial comments, the 14 working days provided for review and preparation of reply comments is wholly inadequate.

Finally, if a technical conference is not convened, the undersigned parties request an extension until June 8, 2007 for the submission of initial comments, with reply comments due by July 23, 2007. This extension, particularly in the absence of the insight which would be provided by a technical conference, provides a more reasonable time frame for analyzing and commenting on the many changes proposed by the Staff.

Therefore, the undersigned parties request that the Commission convene a technical conference in this docket at which time the Staff would be available to identify the reasoning behind its proposed rule changes. The due date for initial comments should be 30 days after the conference, with reply comments due 45 days after the due date for initial comments. If a technical conference is not convened, the due dates for initial comments and reply comments should be extended to June 8 2007 and July 23, 2007, respectively.

Because of the rapidly approaching due date for initial comments, an expedited ruling on this motion is requested pursuant to § 4901-1-12, Ohio Admin. Code. There are no parties to this case. Therefore, the undersigned certify that no party objects to an expedited ruling on this motion.

Respectfully submitted,

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