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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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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 EXTENSION OF TIME AND EXPEDITED RULING

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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.

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Pursuant to Ohio Administrative Code (O.A.C.) Section 4901-1-13, Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company, Columbus Southern Power Company, Ohio Power Company, and The Ohio Hospital Association (the "Joint Signatories") requests that the Commission issue and expedited ruling granting all parties a 14 day extension of time for filing reply comments, in the case captioned above for good cause shown. Specifically, the reply comment due date would be extended from August 22, 2008 to September 5, 2008. The reasons supporting this request are set forth in the attached Memorandum in Support, incorporated herein by reference.

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-)	Case No.	06-653-EL-ORD
24, and 4901:1-25 of the Ohio)		
Administrative Code.)		

MEMORANDUM IN SUPPORT

On July 23, 2008, the Commission issued an Entry seeking comments on Commission Staff's revised proposed rules, as well as responses to questions posed by the Commission. This Entry provided that initial comments were to be filed by August 12, 2008, and reply comments were to be filed by August 22, 2008. The Joint Signatories timely submitted initial comments and are currently in the process of reviewing the initial comments submitted by each of the parties. However, given the voluminous nature of the comments that have been filed, and the fact that approximately nineteen other parties submitted comments for consideration, additional time is necessary to thoroughly review all comments that have been submitted and provide substantive reply comments that address the significant issues raised in certain initial comments. This proceeding is an important rulemaking that was first docketed in 2006, and it is important that it not now be unduly rushed at the end with parties having only 8 business days to prepare and file reply comments.

The Joint Signatories request that the Commission grant a 14-day extension of the due date for the reply comments. The Joint Signatories believe that the 14-day extension requested is both reasonable and necessary in light of the voluminous nature of certain initial comments and the substantial workload with other proceedings running concurrently. The original timeframe providing little more than one work week is insufficient to review the initial comments, draft reply comments, complete management review, and file the reply comments with the Commission. The additional two weeks will allow for more fully developed reply comments that will provide the Commission a better record upon which to render their decision in response to Staff's proposed rules. Due to the abbreviated schedule for the submission of reply comments, the Joint Signatories request an expedited ruling.

Wherefore, for the reasons discussed herein, the Joint Signatories respectfully requests that the Commission issue and expedited ruling granting all parties a 14 day extension of time for filing reply comments for good cause shown.

Respectfully submitted

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the preceding pleading was served this 15th day of August, 2008 upon the parties of record at the addresses listed below via. U.S. mail postage paid.

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