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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION)
OF THE CLEVELAND BOARD OF)
EDUCATION FOR THE CLEVELAND)
MUNICIPAL SCHOOL DISTRICT TO)
ESTABLISH A REASONABLE)
ARRANGEMENT WITH THE)
CLEVELAND ELECTRIC)
ILLUMINATING COMPANY FOR)
ELECTRICAL SERVICE.)

CASE NO. ^{CS}~~09~~-1238-EL-AEC

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**MOTION FOR EXTENSION OF TIME AND CONTINUANCE
AND
REQUEST FOR EXPEDITED RULING
OF
THE CLEVELAND MUNICIPAL SCHOOL DISTRICT**

The Cleveland Municipal School District ("CMSD"), the applicant herein, pursuant to Rules 4901-1-12 and 4901-1-13, Ohio Administrative Code ("OAC"), hereby moves for an order extending the due date for the filing of testimony in this matter to April 16, 2009 and continuing the hearing currently scheduled for April 7, 2009 to April 23, 2009 for those reasons set forth in the accompanying memorandum. CMSD requests an expedited ruling on this motion pursuant to Rule 4901-1-12(C), OAC.

WHEREFORE, CMSD respectfully request that its motion and request for an expedited ruling be granted.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Barth E. Royer", is written over a horizontal line.

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IN THE MATTER OF THE APPLICATION)	
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**MEMORANDUM IN SUPPORT
OF
MOTION FOR EXTENSION OF TIME AND CONTINUANCE
OF
THE CLEVELAND MUNICIPAL SCHOOL DISTRICT**

By entry in this docket of April 1, 2009, the attorney examiner granted the motion filed herein by CMSD on March 27, 2009 requesting a continuance of the hearing previously scheduled to commence April 7, 2009 to April 9, 2009.¹ Subsequent to the filing of the motion, representatives of CMSD and The Cleveland Electric Illuminating Company ("CEI") met to discuss the impact of Commission's March 25, 2009 opinion and order in the FirstEnergy ESP case² on the reasonable arrangement that is the subject of the application in this proceeding. To permit these discussions to continue, CMSD is now requesting an additional extension of the due date for the filing of testimony to April 16, 2009, and that the commencement of the hearing be continued until April 23, 2009. CMSD regrets any inconvenience this second motion for an

¹ CMSD's March 27, 2009 motion also requested an extension of otherwise applicable due date for expert testimony to April 2, 2009. Although the April 1, 2009 Entry did not specifically address this branch of CMSD's motion, by rule, continuing the hearing had the effect of extending the testimony due date to April 2, 2009 as CMSD had requested. See Rule 4901-1-29(A)(1)(h), OAC.

² See Case No. 08-935-EL-SSO (Opinion and Order dated March 25, 2009).

extension and continuance may cause, but believes that the interests of all concerned will be best served by granting this motion.

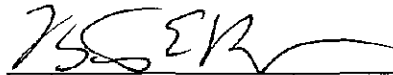
In view of the proximity to the otherwise applicable due date for expert testimony, CMSD has requested an expedited ruling on its motion. In accordance with the requirements of Rule 4901-1-12(C), OAC, undersigned counsel has contacted counsel for staff and for intervenor CEI, the only other party to the case, and is authorized to represent that neither objects to the issuance of an expedited ruling or to the extension and continuance requested in CMSD's motion.

WHEREFORE, CMSD respectfully requests that its motion and request for an expedited ruling be granted.

Respectfully submitted,

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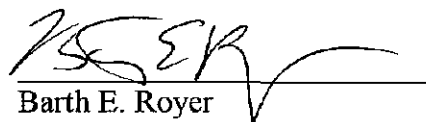


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following parties by first class mail, postage prepaid, and/or by electronic mail this 2nd day of April 2009.


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