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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long Term Forecast :
of the **Duke Energy of Ohio** : Case No. 10-503-EL-FOR
Corporation and Related Matters. :

MOTION FOR A HEARING

Comes now the Staff of the Public Utilities Commission of Ohio and respectfully requests that:

- (1) an evidentiary hearing be held at a date to be determined in the above-referred matter;
- (2) the public hearing be held within 90 days of June 15, 2010; and
- (3) the public hearing be continued to allow sufficient time for examination of the filing in the case and the possibility of settlement discussions; all for the reasons as set forth in the attached memorandum in support.

Respectfully submitted,

/s/ Thomas W. McNamee

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MEMORANDUM IN SUPPORT

R.C. 4935.04(D)(3)(c)(iii) (Baldwin 2010) requires the Commission to hold a hearing on a long-term forecast report upon a demonstration of good cause by an interested party. The Staff believes that good cause exists in this case. The report filed in this docket indicates imminently planned generating facilities for which it appears that a reasonable allowance or a non-bypassable charge or both under R.C. 4928.143(B)(2)(b) or (c) may be sought. See, Report at pp. 175-183. If such an allowance or charge is sought in a future ESP case, the need determination to be made at that time must be informed by an examination of the reasonableness of the inclusion of said solar facilities in the resource planning projections presented in this case.¹

Forecasting hearings are required to begin within 90 days of the filing of a report. Ohio Rev. Code Ann. § 4935.04(D)(3) (Baldwin 2010). Staff would recommend that a

¹ Section 4928.143(B)(2)(b) precludes the commission from granting a construction work in progress allowance unless the need for such a facility is determined, "based on resource planning projections submitted by the electric distribution utility." The instant filing contains the relevant resource planning projections.

public hearing be held within 90 days of June 15, 2010, but that the evidentiary hearing should be scheduled at a later date to permit sufficient time for an adequate examination of issues raised in the report.

Respectfully submitted,

/s/ Thomas W. McNamee

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for a Hearing** was served by regular U.S. mail postage prepaid and by electronic mail upon the parties listed below this 25th day of June, 2010.

/s/ Thomas W. McNamee

Thomas W. McNamee
Assistant Attorney General

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