

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of a New Rider and Revision of an Existing Rider.

Case No. 10-176-EL-ATA

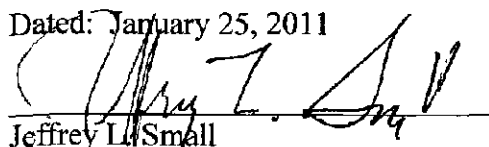
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JOINT MOTION FOR CONTINUANCE BY OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, THE TOLEDO EDISON COMPANY, STAFF OF THE COMMISSION, OFFICE OF THE OHIO CONSUMERS' COUNSEL AND CKAP PARTIES  
(EXPEDITED RULING REQUESTED)

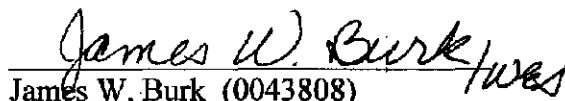
Pursuant to Rule 4901-1-13(A) and other applicable authority, Applicants Ohio Edison Company ("OE"), The Cleveland Electric Illuminating Company ("CEI") and The Toledo Edison Company ("TE") (collectively the "Companies") together with the Staff of the Commission, the Office of the Ohio Consumers' Counsel ("OCC") and the CKAP Parties<sup>1</sup> respectfully request a continuance of the commencement of the hearing, currently scheduled to commence on January 27, 2011. The reasons for this Motion are set forth in the accompanying Memorandum.

Pursuant to Rule 4901-1-12(C), the Companies request an expedited ruling on this Motion.

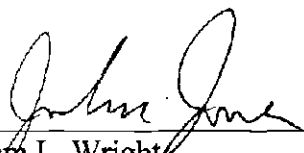
Dated: January 25, 2011

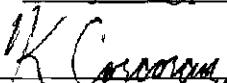
  
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<sup>1</sup> The CKAP parties include Citizens For Keeping the All Electric Promise ("CKAP"), Sue Steigerwald, Bob Schmitt Homes, Inc. and Joan Heginbotham.

  
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ATTORNEYS FOR APPLICANTS OHIO  
EDISON COMPANY, THE CLEVELAND  
ELECTRIC ILLUMINATING COMPANY,  
AND THE TOLEDO EDISON COMPANY

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**Case No. 10-176-EL-ATA**

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**MEMORANDUM IN SUPPORT OF JOINT MOTION FOR CONTINUANCE**

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The evidentiary hearing in this matter is currently scheduled to commence on January 27, 2011. In order to explore the possibility of a settlement of the issues raised in this proceeding, the Commission Staff, the Office of the Ohio Consumers' Counsel, the CKAP parties, and the Companies have agreed to a one week extension of the hearing date in this matter. Due to the extremely limited time period prior to the scheduled hearing date, the other parties to this proceeding were notified by email that this Motion for Continuance was going to be filed on January 25, 2011, and were asked if they objected to a ruling on this Motion without the filing of memoranda, but time did not permit all of the other parties to respond prior to the filing of the Motion as to whether they objected to an expedited ruling on the matter.<sup>1</sup>

No party will be prejudiced by the relief requested in this Motion. In fact, commencement of the hearing just one week later than currently scheduled will have no effect on the rates charged to customers receiving the Residential Generation Credit (Rider RGC), as the Commission has previously indicated that, regardless of the outcome of this proceeding, these credits will remain in place "at a minimum . . . through the next winter heating season" (*i.e.*, through May 2011). See Second Entry on Reh'g dated Apr. 15, 2010, ¶ 7. Moreover, because

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<sup>1</sup> Constellation New Energy, Inc., Industrial Energy Users- Ohio and OP&E did respond that they did not object.

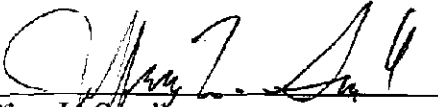
Rider RGC will not be applied during the summer months (i.e., June through August), the Commission and parties have several months to resolve the issues in this proceeding. *See id.* There is more than enough time available to complete the hearing.

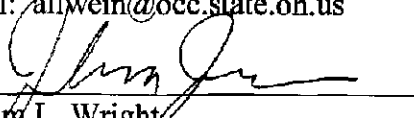
Further, reaching a settlement in this proceeding among the parties will conserve the time and resources of the parties as well as those of the Commission, and will serve to expedite a resolution to the issues presented in the proceeding to the benefit of all stakeholders.

For the above reasons, the Companies respectfully request that the Commission, on an expedited basis, grant the Companies' Motion for Continuance and continue commencement of the hearing until February 3, 2011.

DATED: January 25, 2011

Respectfully submitted,

  
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ATTORNEYS FOR APPLICANTS OHIO  
EDISON COMPANY, THE CLEVELAND  
ELECTRIC ILLUMINATING COMPANY,  
AND THE TOLEDO EDISON COMPANY

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Continuance by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (Expedited Ruling Requested) and Memorandum in Support was delivered to the following persons by electronic service this 25th day of January, 2011:

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