

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company and MACtac dba)	
Morgan Adhesives)	Case No. 11-2044-EL-EEC
)	

MOTION TO EXTEND FILING DEADLINE

Ohio Edison Company (“Ohio Edison”) moves the Commission for an Order extending the filing deadline on behalf of MACtac dba Morgan Adhesives (“MACtac”) pursuant to the Second Entry on Rehearing issued by the commission on May 25, 2011, in Case No. 10-834-EL-POR, and allowing Ohio Edison to file a mercantile application *instanter*. MACtac implemented energy efficiency and/or peak demand reduction projects in 2006 and/or 2007. Due to special circumstances, Ohio Edison was unable to file a complete application prior to the deadline set forth in the Commission’s Second Entry on Rehearing. For the reasons set forth in the accompanying Memorandum in Support, Ohio Edison’s Motion should be granted. Filed simultaneously with this Motion, is the Application of Ohio Edison and MACtac.

Respectfully submitted,

/s/ Kevin P. Shannon

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COMPANY

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MEMORANDUM IN SUPPORT OF MOTION TO EXTEND FILING DEADLINE

Pursuant to the Second Entry on Rehearing issued by the Commission on May 25, 2011, in Case No. 10-834-EL-POR, Ohio Edison Company (“Ohio Edison”) seeks an extension of the deadline established by the Commission for the filing of mercantile applications containing projects implemented in 2006 and 2007 to file an Application on behalf of MACtac dba Morgan Adhesives (“MACtac”), *instanter*. MACtac was unable to compile and execute all of the necessary documentation prior to the initial deadline established by the Commission.

On May 25, 2011, the Commission issued its Second Entry on Rehearing finding that energy efficiency and peak demand reduction projects implemented in 2006 and 2007 would be eligible for counting and incentives if already included in a pending application or filed within thirty days of the Commission’s Entry. May 25, 2011 Entry at ¶15. The Commission further provided that an applicant could seek an extension of that deadline for an additional thirty days if warranted due to special circumstances. Subsequently, Ohio Edison moved for rehearing in Case No. 10-834-EL-POR and requested that the Commission grant it until March 15, 2012, to file applications containing projects implemented in 2006 and 2007. The Commission granted that application and issued its Third Entry on Rehearing on July 15, 2011, for further consideration. July 15, 2011 Entry at ¶5.

Special circumstances exist here. Ohio Edison was unable to file an application on behalf of MACtac because MACtac could not assemble the necessary documentation in enough time to file within the original deadline. MACtac also experienced technical difficulties in its IT department that prevented it from completing the Application within the Commission's deadline. Granting an extension of time to file the Application *instanter* is equitable and just under the circumstances. The Application is being filed in this docket simultaneously with this Motion.

WHEREFORE, Ohio Edison respectfully requests that the Commission grant this Motion and accept the Application for filing in this docket.

Respectfully submitted,

/s/ Kevin P. Shannon

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Summary: Motion to Extend Filing Deadline electronically filed by Mr. Kevin P. Shannon on behalf of Ohio Edison Company