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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Columbus Southern Power Company and	)	Case Nos. 11-346-EL-SSO
Ohio Power Company for Authority to	)	11-348-EL-SSO
Establish a Standard Service Offer	)	
Pursuant to § 4928.143, Ohio Rev. Code,	)	
in the Form of an Electric Security Plan.	)	

In the Matter of the Application of	)	
Columbus Southern Power Company and	)	Case Nos. 11-349-EL-AAM
Ohio Power Company for Approval of	)	11-350-EL-AAM
Certain Accounting Authority.	)	

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**OPPOSITION OF FIRSTENERGY SOLUTIONS CORP., INDUSTRIAL ENERGY
USERS-OHIO, AND OHIO PARTNERS FOR AFFORDABLE ENERGY
TO THE *THIRD* JOINT MOTION FOR CONTINUANCE
OF HEARING DATE AND REQUEST FOR EXPEDITED TREATMENT**

FirstEnergy Solutions Corp., Industrial Energy Users-Ohio, and Ohio Partners for Affordable Energy hereby oppose the third Joint Motion for Continuance of Hearing Date filed in the above-captioned action. This third Joint Motion, which was initiated by Applicants Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio") and joined by some intervenors, seeks yet another extension of time that represents an unnecessary and prejudicial delay in the proceedings. The hearing has already been continued twice, both times under the premise of continued settlement negotiations. During the previous two extensions, the parties invested significant time and effort in seeking a resolution of this matter. However, AEP Ohio's participation in those discussions has not been productive. AEP Ohio has had ample time to prepare a proposed stipulation, but no viable option has been presented. It is clear that a full settlement on an application that was filed *over seven months ago* is not likely and, thus, yet another delay in the hearing — which affects the schedules of numerous parties,

counsel, in-state and out-of-state witnesses, Staff, and the Commission — is neither warranted nor appropriate.

Indeed, a further extension endangers the Commission's scheduling of other important matters, including AEP Ohio's request for cost-based capacity pricing in Case No. 10-2929-EL-UNC and Duke Energy Ohio's ESP application in Case No. 11-3549-EL-SSO. A further extension of this ESP proceeding unduly burdens intervenors in the 10-2929 case, in which testimony is due on September 23, 2011. Intervenor testimony in the 10-2929 case is likely to be provided by some of the same witnesses testifying in this ESP proceeding. A further extension in this ESP proceeding likely will mean that testimony in the 10-2929 case will have to be prepared and filed entirely while this ESP proceeding is in hearing. However, if the 10-2929 schedule is pushed back further to accommodate the delays in this ESP proceeding, it will result in a conflict with the schedule in the Duke Energy Ohio ESP case, in which intervenor testimony is due October 5, 2011, Staff testimony is due October 13, 2011, and the hearing is scheduled to commence on October 20, 2011. The multiple delays in this ESP proceeding already have prejudiced the ability of intervenors to devote an appropriate amount of time to responding to Duke Energy Ohio's ESP application. In order to protect the Commission's docket, the hearing in this ESP proceeding should not be delayed further.

The Joint Motion should be denied so that this matter can finally proceed to hearing on August 31, 2011.

Respectfully submitted,

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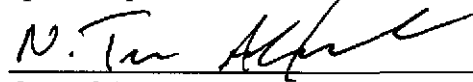
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Opposition of FirstEnergy Solutions Corp., Industrial Energy Users-Ohio, and Ohio Partners for Affordable Energy to the Third Joint Motion for Continuance of Hearing Date and Request for Expedited Treatment* was served this 30th day of August, 2011, via e-mail upon the parties below.



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