

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review)
of Chapter 4901:1-15, OAC, Standards for) Case No. 11-5605-WS-ORD
Waterworks Companies and Sewage)
Disposal System Companies.)

**JOINT MOTION FOR EXTENSION OF TIME TO FILE COMMENTS
AND
REQUEST FOR EXPEDITED RULING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL
AND
AQUA OHIO, INC.**

The Office of the Ohio Consumers' Counsel ("OCC") and Aqua Ohio, Inc. ("Aqua") respectfully move for an extension of time to file comments in this proceeding.¹ To this end, OCC and Aqua request that the current filing deadline of November 30, 2011, be extended until December 12, 2011. OCC and Aqua also request an expedited ruling on this Motion, pursuant to Ohio Adm. Code 4901-1-12(C).²

This Motion should be granted for good cause on an expedited basis, for the reasons more fully set forth in the accompanying memorandum in support.

¹ Ohio Adm. Code 4901-1-12(C) and Ohio Adm. Code 4901-1-13(A).

² At the time of filing, no motions to intervene had been filed in this proceeding. Accordingly, there are no Parties to contact in regards to this request for an expedited ruling. *See* Ohio Adm. Code 4901-1-12(C) and Ohio Adm. Code 4901-1-12(E).

Respectfully submitted,

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MEMORANDUM IN SUPPORT

Ohio Adm. Code 4901-1-13(A) allows for extensions of time to file pleadings and other papers to be granted for good cause shown. Ohio Adm. Code 4901-1-12(C) provides that a party may request an expedited ruling on its motion and that an immediate ruling may be issued if the moving party certifies that no party objects to the issuance of such a ruling. For the following reasons, there is good cause to grant this Motion on an expedited basis.

On November 9, 2011, the Public Utilities Commission of Ohio ("PUCO" or "Commission") issued an Entry establishing a schedule for interested persons to file comments in this proceeding which relates to Ohio Adm. Code 4901:1-15 (Ohio's Standards for Waterworks Companies and Sewage Disposal System Companies). The PUCO Staff has proposed various amendments to these rules.³ Pursuant to the November 9, 2011 Entry, comments of interested parties must be filed by November 30, 2011. However, OCC and Aqua need additional time to review and analyze the PUCO Staff's proposed amendments to the rules, determine whether any other amendments to the rules should be proposed and prepare comments accordingly. Furthermore, the Thanksgiving holiday is the week before the filing deadline established by the November 9, 2011 Entry.

³ See Staff's proposed changes, attached to the November 11, 2011 Entry.

Accordingly, OCC and Aqua respectfully request an extension of time for filing comments—until December 12, 2011. The requested extension of the filing deadline will permit OCC, Aqua, and other interested parties adequate time to review and comment on the PUCO Staff's proposed amendments to Ohio Adm. Code Chapter 4901:1-15 and analyze whether other changes are needed. For these reasons, there is good cause for the extension, under Ohio Admin. Code 4901-1-13(A).

Finally, OCC and Aqua request an expedited ruling on this Motion, pursuant to Ohio Admin. Code 4901-1-12(C). At the time of this filing, no motions to intervene have been filed in this proceeding. Accordingly, there are no Parties to contact in regards to this request for an expedited ruling.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Motion upon those listed below, via electronic transmission, this 21st day of November, 2011.

/s/ Melissa R. Yost
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Summary: Motion Joint Motion for Extension of Time to File Comments and Request for Expedited Ruling by the Office of the Ohio Consumers' Counsel and Aqua Ohio, Inc. electronically filed by Ms. Deb J. Bingham on behalf of Yost, Melissa R. Ms.