

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

|                               |   |                        |
|-------------------------------|---|------------------------|
| MATERIAL SCIENCE CORPORATION, | ) |                        |
|                               | ) |                        |
| Complainant,                  | ) | Case No. 12-919-EL-CSS |
|                               | ) |                        |
| v.                            | ) |                        |
|                               | ) |                        |
| THE TOLEDO EDISON COMPANY,    | ) |                        |
|                               | ) |                        |
| Respondent.                   | ) |                        |

**MOTION TO CONTINUE AND HOLD IN ABEYANCE**

Pursuant to Ohio Adm. Code 4901-1-13(A) and 4901-1-12(A), The Toledo Edison Company (“TE”) moves to continue and hold this proceeding in abeyance. After extensive negotiations, the Parties have come to a settlement in principle that is dependent upon the disposition of TE’s Electric Security Plan case. Reasons for granting this motion are set forth in the accompanying memorandum in support.

Dated: April 13, 2012

Respectfully submitted,

/s/ Melissa L. Thompson  
Mark A. Whitt (Counsel of Record)  
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ATTORNEYS FOR RESPONDENT  
THE TOLEDO EDISON COMPANY

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|                               | ) |                        |
| THE TOLEDO EDISON COMPANY,    | ) |                        |
|                               | ) |                        |
| Respondent.                   | ) |                        |

**MEMORANDUM IN SUPPORT OF  
MOTION TO CONTINUE AND HOLD IN ABEYANCE**

Material Sciences Corporation (“MSC”) filed its Complaint on March 12, 2012. The Toledo Edison Company (“TE”) filed a Motion to Extend Time to file its Answer on April 2, 2012, which was granted by Entry on April 3, 2012. Since this time, TE and MSC have reached a settlement in principle of the claims raised in this proceeding.

Good cause exists to grant TE’s motion pursuant to Ohio Adm. Code 4901-1-13(A) and 4901-1-12(A). The Parties began negotiating a settlement to this proceeding after MSC filed its complaint. After extensive negotiations, the Parties resolved all of the issues raised in MSC’s complaint. As a condition of settlement, certain items contained in TE’s Electric Security Plan (“ESP”) proceeding must be approved. As such, the Parties request an indefinite continuance and that the Commission hold this case in abeyance until the disposition of TE’s ESP Proceeding. Today, TE filed its Application for authority to establish an Standard Service Offer in the form of an ESP. This Application is supported by a Stipulation and Recommendation, of which MSC is a signatory party. MSC does not oppose holding this case in abeyance until the Commission rules upon TE’s ESP proceeding.

WHEREFORE, The Toledo Edison Company respectfully requests to continue and hold this case in abeyance until TE's ESP proceeding is disposed.

Dated: April 13, 2012

Respectfully submitted,

/s/ Melissa L. Thompson

Mark A. Whitt (Counsel of Record)

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ATTORNEYS FOR RESPONDENT  
THE TOLEDO EDISON COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Continue and Hold in Abeyance and Memorandum in Support was served by electronic mail this 13th day of April, 2012, to the following:

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Attorney for Complainant  
Material Science Corporation

/s/ Melissa L. Thompson  
One of the Attorneys for Respondent  
The Toledo Edison Company

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**Case No(s). 12-0919-EL-CSS**

Summary: Motion to Continue and Hold in Abeyance electronically filed by Ms. Melissa L. Thompson on behalf of The Toledo Edison Company