

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)	
Establishment of a Reasonable)	Case No. 12-1494-EL-AEC
Arrangement Between ASHTA)	
Chemicals Inc. and The Cleveland)	
Electric Illuminating Company.)	

**ASHTA CHEMICALS INC.'S MEMORANDUM IN RESPONSE TO THE MOTION TO
EXPEDITE DISCOVERY SCHEDULE OF THE OHIO ENERGY GROUP**

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November 8, 2012

Attorneys for ASHTA Chemicals Inc.

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On November 6, 2012, Ohio Energy Group ("OEG") filed a motion seeking an expedited discovery schedule. Specifically, OEG seeks an order establishing a ten day deadline for responses. Memorandum in Support of the Ohio Energy Group's Motion to Expedite Discovery Schedule at 3 (Nov. 6, 2012). On November 7, 2012, counsel for ASHTA Chemicals Inc. ("ASHTA") served discovery on OEG.

ASHTA has previously demonstrated to the Commission Staff and the Attorney Examiner its interest in assuring that parties understand the nature and effect of the proposed reasonable arrangement. As the Attorney Examiner has concluded, ASHTA has provided requested information when concerns have been raised regarding the proposed arrangement. Entry at 2 (Sept. 21, 2012).

ASHTA does not oppose the motion and only requests that the same requirements be placed on all parties.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing ASHTA *Chemicals Inc.'s Memorandum in Response to the Motion to Expedite Discovery Schedule of the Ohio Energy Group* was served upon the following parties of record this 8th day of November 2012, *via* hand-delivery, electronic transmission, or first class mail, U.S. postage prepaid.

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ATTORNEY EXAMINER

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Summary: Memorandum IN RESPONSE TO THE MOTION TO EXPEDITE DISCOVERY SCHEDULE OF THE OHIO ENERGY GROUP electronically filed by Mr. Frank P Darr on behalf of ASHTA Chemicals, Inc.