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)	

JOINT MOTION FOR A CONTINUANCE AND MEMORANDUM IN SUPPORT SUBMITTED ON BEHALF OF ASHTA CHEMICALS INC. AND PUCO STAFF

Pursuant to Rule 4901-1-13, Ohio Administrative Code, ASHTA Chemicals Inc. ("ASHTA"), and the Staff of the Public Utilities Commission of Ohio ("Staff") respectfully request that the procedural schedule in this case be continued for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

/s/ Scott E. Elisar Samuel C. Randazzo Frank P. Darr Scott E. Elisar Joseph E. Oliker McNees Wallace & Nurick LLC 21 East State Street, 17th Floor Columbus, Ohio 43215 (614) 469-8000 (T) (614) 469-4653 (Fax) sam@mwncmh.com fdarr@mwncmh.com selisar@mwncmh.com joliker@mwncmh.com

/s/ Thomas W. McNamee

Thomas W. McNamee

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COUNSEL FOR ASHTA CHEMICALS INC.

Before The Public Utilities Commission of Ohio

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JOINT MEMORANDUM IN SUPPORT

Business and commercial matters of ASHTA as well as ongoing discussions with Staff necessitate the requesting of a continuance for additional time for preparation in this matter. The Public Utilities Commission of Ohio's consideration of this case will be enhanced by a full exposition of all relevant matters. An extension of the procedural schedule will allow this to occur. ASHTA and Staff would, therefore, ask that the date for the filing of testimony be moved to June 5, 2013, and, the hearing moved to June 19, 2013. No party to the case has an objection to this procedural change.

Respectfully submitted,

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COUNSEL FOR THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO

{C39964: }

CERTIFICATE OF SERVICE

We hereby certify that a copy of the foregoing Joint Motion for a Continuance and Memorandum In Support Submitted on Behalf of ASHTA Chemicals Inc. and Staff, was served upon the following parties of record this 16th day of April 2013, via electronic transmission.

/s/ Scott E. Elisar Scott E. Elisar /s/ Thomas W. McNamee
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ATTORNEY EXAMINER

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Summary: Motion (Joint Motion) for Continuance and Memorandum in Support electronically filed by Scott E. Elisar on behalf of ASHTA Chemicals Inc.