

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of :
Camplands Water, LLC for an Increase : Case No. 13-1690-WW-AIR
in its Rates and Charges. :

**JOINT MOTION FOR CONTINUANCE OF THE EVIDENTIARY HEARING,
EXTENSION OF TESTIMONY DEADLINES, AND EXPEDITED
CONSIDERATION**

The Staff of the Public Utilities Commission of Ohio (“Staff”), Camplands Water LLC and Holiday Camplands Association Inc. (collectively “Joint Movants”), pursuant to Ohio Administrative Code 4901-1-13(A), respectfully request a two-week continuance of the evidentiary hearing reflected in the January 10, 2014 Entry and two-week extension of the testimony deadlines agreed to at the February 20, 2014 prehearing conference. Joint movants also request that the Commission grant Joint Movants’ motion on an expedited basis pursuant to O.A.C. 4901-1-12(C). The reasons for this motion are set forth more fully in the attached memorandum.¹

Respectfully submitted,

Mike DeWine
Attorney General

/s/ *Steven L. Beeler*

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MEMORANDUM IN SUPPORT

On July 26, 2013, Camplands Water LLC submitted an application for approval of an increase in rates and charges in the above-captioned proceeding. By entry dated January 10, 2014 and agreement at the February 20, 2014 prehearing, the Commission adopted a procedural schedule setting a date for the filing of testimony and an evidentiary hearing as follows:

1. Testimony on behalf of Staff is to be filed by March 6, 2014.
2. Factual Testimony on behalf of Holiday Camplands Association Inc. is to be filed by March 6, 2014.
3. The evidentiary hearing is to begin on March 13, 2014 at 10:00 a.m.

For the reasons set forth below, Joint Movants request a two-week continuance of the evidentiary hearing and a two-week extension of the testimony filing deadlines which would amend the procedural schedule as follows:

1. Testimony on behalf of Staff is to be filed by March 20, 2014.
2. Factual Testimony on behalf of Holiday Camplands Association Inc. is to be filed by March 20, 2014.
3. The evidentiary hearing is to begin on March 27, 2014 at 10:00 a.m.

All of the parties in this proceeding have been engaged in productive settlement negotiations, and the parties believe they may be close to a stipulation. Accordingly, Joint Movants respectfully request an extension as described above in order to continue

settlement discussions and efficiently present the potential settlement and supporting testimony.

O.A.C. 4901-1-12(C) allows a party to request that the Commission consider a motion on an expedited basis. Accordingly, Joint Movants respectfully request an expedited ruling that the testimony filing deadlines and the hearing date be postponed by two weeks. The undersigned counsel for Staff has been given the authority to make and sign this motion on behalf of all the other parties to this proceeding.

Respectfully Submitted,

Mike DeWine
Attorney General

William L. Wright
Section Chief

/s/ Steven L. Beeler

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Motion has been served upon the below-named counsel via electronic mail, this 4th day of March, 2014.

/s/ *Steven L. Beeler*

Steven L. Beeler

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Summary: Motion Joint Motion for Continuance of the Evidentiary Hearing, Extension of Testimony Deadlines, and Expedited Consideration, submitted by Assistant Attorney General Steven Beeler on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio