

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio :
Edison Company, The Cleveland Electric : Case No. 14-1297-EL-SSO
Illuminating Company, and The Toledo :
Edison Company for Authority to :
Provide for a Standard Service Offer :
Pursuant to R.C. 4928.143 in the Form of :
an Electric Security Plan. :

**MOTION FOR CONTINUANCE
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

On January 14, 2015 the procedural schedule in this case was adjusted to require the following:

Intervenor Testimony February 5, 2015

Staff Testimony February 18, 2015

Pre-hearing Conference February 18, 2015 and,

Evidentiary Hearing February 24, 2015.

The Staff now requests that these dates be adjusted by forty five days for the reason set forth in the attached memorandum in support.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Thomas W. McNamee

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**Counsel for the Staff of
The Public Utilities Commission of Ohio**

MEMORANDUM IN SUPPORT

Staff has encountered more difficulty than was expected in analyzing the application in light of the proposed stipulation. Additional time is necessary for a complete analysis to be accomplished. Granting the forty five day adjustment to the procedural schedule will provide the needed time to finish this review and analysis to occur. Staff is not seeking to extend the discovery period.

Staff believes that the public interest will be served by granting this procedural adjustment. The adjustment will provide the Staff with the time and resources to accomplish its legal obligations and will result in the creation of a more thorough record for the Commission's consideration.

Pursuant to Rule 4901-1-12(C), Staff also requests expedited consideration of this motion. Counsel has notified all other parties of the filing of this motion to determine whether any party objects to the issuance of an expedited ruling without the filing of memoranda. I am informed that the applicant objects. I am unaware that any other party does so.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

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Counsel for the Staff of
The Public Utilities Commission of Ohio

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Continuance** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the following Parties of Record, this 4th day of February, 2015.

/s/ Thomas W. McNamee

Thomas W. McNamee

Assistant Attorney General

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Summary: Motion for Continuance submitted by Assistant Attorney General Thomas McNamee 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