

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's : Case No. 12-3151-EL-COI
Investigation of Ohio's Retail Electric :
Service Market. :

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE STAFF REPORT
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In accordance with Ohio Adm. Code 4901-1-13(A), Staff seeks a seven day extension of time to file its Staff Report. A memorandum in support is attached.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Ryan O'Rourke

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**On behalf of the Staff of
The Public Utilities Commission of Ohio**

MEMORANDUM IN SUPPORT

As part of its investigation into the health, strength, and vitality of Ohio's competitive retail electric service (CRES) market, the Commission tasked Staff with facilitating a discussion within the Market Development Working Group (MDWG) to develop an operational plan that implements either a statewide seamless move, contract portability, instant connect, or a warm transfer process.¹ The Commission noted that the operational plan should account for the Commission's preference for permitting shopping customers to maintain their status as shopping customers.² The Commission further explained that once the operational plan had developed, Staff should then file a Staff Report incorporating the operational plan in a case with an EL-EDI designation.³ The Staff Report is supposed to consider and propose the proper forum for implementing Staff's proposal, and identify whether any rules should be amended to implement the proposal.⁴

The Commission instructed Staff to file its Staff Report no later than one year from the Finding and Order of March 26, 2014,⁵ thus making March 26, 2015 as the

¹ *In the Matter of the Commission's Investigation of Ohio's Retail Electric Service Market*, Case No. 12-3151-EL-COI (Finding and Order at 25) (Mar. 26, 2014).

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

deadline to file the Staff Report. On February 24, 2015, Staff filed a motion to extend the deadline to file its Report by 45 days. The Commission granted this motion and set May 11, 2015 as the new filing deadline.⁶ Staff has determined, however, that it still needs more time to prepare the Report. Staff thus seeks to extend the filing deadline by seven days to May 18, 2015. This modest extension will provide adequate time for the Staff to comply with the Commission's directive set forth in its March 26, 2014, Finding and Order.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Ryan O'Rourke

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**On behalf of the Staff of
The Public Utilities Commission of Ohio**

⁶ *In the Matter of the Commission's Investigation of Ohio's Retail Electric Service Market*, Case No. 12-3151-EL-COI (Entry at 1) (March 3, 2015).

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Second Motion for Extension of Time to File Staff Report** 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 11th day of May, 2015.

/s/ Ryan O'Rourke

Ryan P. O'Rourke

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Case No(s). 12-3151-EL-COI

Summary: Motion Second Motion for Extension of Time to File Staff Report submitted by Assistant Attorney General Ryan O'Rourke 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