

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

JOINT MOTION TO AMEND PROCEDURAL SCHEDULE

Pursuant to Rules 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, the Retail Energy Supply Association, the PJM Power Provider's Group, the Electric Power Supply Association, the Ohio Consumers' Counsel, Ohio Partners for Affordable Energy, the Ohio Manufacturers' Association Energy Group, the Northeast Ohio Public Energy Council ("the Joint Movants") respectfully move for a brief extension in the procedural schedule set forth in the June 1 Entry as modified at the June 2, 2015 prehearing conference. Specifically, the Joint Movants request that discovery requests (except as to notices of deposition) be permitted to extend until July 2, 2015,¹ that the intervenors be permitted to file their additional supplemental testimony on July 16, 2015, that the Staff testimony be filed by July 20, 2015, that the prehearing conference be held on July 24, 2015, and that the evidentiary hearing commence on August 6, 2015.

The reasons for the Joint Request to Amend the Procedural Schedule are set forth in the accompanying Memorandum in Support. Good cause exists for modifying the procedural schedule.

¹ The deadline for responding discovery requests would remain at seven days.

WHEREFORE, the Joint Movants respectfully request that the attorney examiner modify the procedural schedule set forth in the June 1 Entry as modified at the June 2 hearing conference.

Respectfully submitted,

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

MEMORANDUM IN SUPPORT

On June 1, 2015, the Attorney Examiner issued an Entry in this matter modifying the procedural schedule for this case. That Entry directed that a prehearing conference be held on June 2, that staff testimony be filed on July 10, that a prehearing conference be scheduled for July 14, and that an evidentiary hearing be convened on July 27. At the June 2 prehearing conference, the attorney examiner indicated that the deadline for submitting additional discovery requests should be June 22, that responses to the additional discovery must be served within seven days, and that Intervenor supplemental testimony could be filed on July 6.

On June 4, the applicants and other parties filed a Second Supplemental Stipulation and Recommendation. Also, Attachment 1 to the second supplemental stipulation was filed on June 4. In addition, the fourth supplemental testimony of Eileen M. Mikkelson was filed on behalf of the applicants.

The filings made on June 4 introduce a completely new Section V.A.3 to the stipulation. Under this proposed new section, the companies propose to agree to deploy a Commercial High Load Factor ("HLF") Experimental Time-of-Use Rate Proposal for commercial customers with headquarters located in Ohio having at least 30 facilities in the Company's combined service territory with each facility consuming at least 1.5GW annually and having refrigeration as a

major portion of the load. In addition, this proposed HLF Experimental Time-of-Use Rate Proposal requires that each individual facility must have interval metering, must have an average monthly load factor during the preceding 12 months of 70% or higher, and must otherwise be served under the Company's GS or GP rate schedules. The Commercial HLF Experimental Time-of-Use Rate Proposal purports to give the Companies' commercial customers an opportunity to determine whether time-of-use rates could reduce their overall energy bills. Once a facility qualifies for the Commercial HLF Experimental Time-of-Use Rate and is enrolled in the Commercial HLF Experimental Time-of-Use Rate, that facility may remain on that rate notwithstanding any subsequent change in the load characteristics of the facility or reduction in energy consumption by the facility.

This is a new offering not related to any other aspect of the Application, original Stipulation and Recommendation, or the Supplemental Stipulation and Recommendation. No discovery has been conducted on the proposed Commercial HLF Experimental Time-of-Use Rate Proposal. It is unclear who will actually benefit from this proposal, and whether the limitations and restrictions are reasonable. Further, if there is a benefit, discovery needs to be utilized to determine what the cost will be and who will bear such costs.

Because of this new rate proposal contained in the Second Supplemental Stipulation and Recommendation, the Joint Movants seeks additional time to conduct discovery and to possibly address this new proposal in their supplemental testimony.

The Joint Movants respectfully request a slight modification to the previously announced procedural schedule in order to afford parties a brief amount of time to conduct additional discovery. Specifically, the Joint Movants request that discovery be extended until July 2. The Joint Movants also respectfully request that the due date for Intervenor supplemental testimony

be extended from July 6 to July 16, and Staff testimony would be due July 20. Thus, the prehearing conference previously scheduled for July 14 should be extended until July 24. Finally, the Joint Movants respectfully request that the evidentiary hearing previously scheduled for July 27 at 10:00 a.m. be moved to begin on August 6 at 10:00 a.m. Granting this joint motion for a brief 10-day extension is not unduly burdensome and will permit adequate time for discovery and the preparation of supplemental testimony so that this new proposal can be explored and addressed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 8th day of June, 2015.

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Summary: Motion (Joint Motion) to Amend Procedural Schedule electronically filed by Mrs. Gretchen L. Petrucci on behalf of Retail Energy Supply Association and PJM Power Providers Group and Electric Power Supply Association and Ohio Consumers' Counsel and Ohio Partners for Affordable Energy and Ohio Manufacturers' Association Energy Group and Northeast Ohio Public Energy Council