

**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. :

**FOURTH 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 45-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 then filed a second motion on May 11, 2015 to extend the filing deadline by seven days to May 18, 2015. The Commission granted this motion.⁷ On May 18, 2015, Staff filed a third motion for extension, which sought to extend the deadline by 30 days to June 17, 2015. The Commission granted this motion.⁸

Staff now seeks to extend the June 17, 2015 deadline by an additional 45 days to August 3, 2015.⁹ This 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.

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).

⁷ *Id.* (Entry at 2) (May 11, 2015).

⁸ *Id.* (Entry at 2) (May 18, 2015).

⁹ The 45th day falls on Saturday, August 1, 2015, thus by operation of Ohio Adm. Code 4901-1-07(A) the due date shifts to Monday, August 3, 2015.

Respectfully submitted,

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

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Fourth 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 17th day of June, 2015.

/s/ Ryan O'Rourke

Ryan P. O'Rourke

Assistant Attorney General

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/17/2015 2:39:10 PM

in

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

Summary: Motion Fourth 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