

BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application	)	
Seeking Approval of Ohio Power	)	
Company's Proposal to Enter into an	)	Case No. 14-1693-EL-RDR
Affiliate Power Purchase Agreement	)	
for Inclusion in the Power Purchase	)	
Agreement Rider.	)	
	)	

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**MOTION TO FILE OUT-OF-TIME THE  
DIRECT TESTIMONY OF BRUCE BURCAT  
BY  
MID-ATLANTIC RENEWABLE ENERGY COALITION**

**September 14, 2015**

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Mid-Atlantic Renewable Energy Coalition now respectfully moves the Attorney Examiners, pursuant to O.A.C. 4901-1-12(A) for leave to file the Direct Testimony of Bruce Burcat. For the reasons set forth in the accompanying Memorandum in Support, Mid-Atlantic Renewable Energy Coalition respectfully requests that the Attorney Examiners grant this Motion for out-of-time filing of Direct Testimony of Bruce Burcat and the certificate of service.

Respectfully submitted,

/s/ Terrence O'Donnell

Terrence O'Donnell (0074213)  
Attorney for Mid-Atlantic Renewable  
Energy Coalition

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**MEMORANDUM IN SUPPORT OF MID-ATLANTIC RENEWABLE ENERGY  
COALITION'S MOTION TO FILE OUT-OF-TIME THE  
DIRECT TESTIMONY OF BRUCE BURCAT**

**September 14, 2015**

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Mid-Atlantic Renewable Energy Coalition respectfully requests that the Attorney Examiners grant this Motion for out-of-time filing of Direct Testimony of Bruce Burcat (the "Testimony"), filed in this proceeding on behalf of the Mid-Atlantic Renewable Energy Coalition ("MAREC"), and the related certificate of service. MAREC was previously undecided about whether or not to file testimony in this case, and decided only recently to file when it seemed clear that no other party was adequately representing the interests of the renewable energy industry. In the interest of allowing a representative of the renewable energy industry to be heard in this case, MAREC respectfully requests that the Testimony and the certificate of service be accepted for filing.

Respectfully submitted,

/s/ Terrence O'Donnell

Terrence O'Donnell (0074213)  
Attorney for Mid-Atlantic Renewable  
Energy Coalition

## CERTIFICATE OF SERVICE

The Public Utility 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 14th day of September, 2015.

*/s/ Terrence O'Donnell*

Terrence O'Donnell (0074213)

Thomas.mcnamee@puc.state.oh.us  
Katie.johnson@puc.state.oh.us  
haydenm@firstenergycorp.com  
jmcdermott@firstenergycorp.com  
scasto@firstenergycorp.com  
jlang@calfee.com  
talexander@calfee.com  
myurick@taftlaw.com  
callwein@wamenergylaw.com  
tony.mendoza@sierraclub.org  
todonnell@dickinsonwright.com  
tdougherty@theOEC.org  
toddm@wamenergylaw.com  
jeffrey.mayes@monitoringanalytics.com  
ricks@ohanet.org  
tobrien@bricker.com  
mhpetricoff@vorys.com  
mjsettineri@vorys.com  
glpetrucci@vorys.com  
mdortch@kravitzllc.com  
joliker@igsenergyw.com  
mswhite@igsenergy.com  
stnourse@aep.com

mkurtz@BKLawfirm.com  
kboehm@BKLawfirm.com  
jkylercohn@BKLawfirm.com  
sam@mwncmh.com  
fdarr@mwncmh.com  
mpritchard@mwncmh.com  
Kurt.Helfrich@ThompsonHine.com  
Scott.Campbell@ThompsonHine.com  
Stephanie.Chmiel@ThompsonHine.com  
lhawrot@spilmanlaw.com  
dwilliamson@spilmanlaw.com  
Stephen.Chriess@walmart.com  
Schmidt@sppgrp.com  
jfinnigan@edf.org  
Bojko@carpenterlipps.com  
mfleisher@elpc.org  
msmalz@ohiopoveritylaw.org  
cmooney@ohiopartners.org  
joseph.clark@directenergy.com  
ghull@eckertseamans.com  
mjsatterwhite@aep.com  
msmckenzie@aep.com

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Summary: Motion electronically filed by Terrence O'Donnell on behalf of Mid-Atlantic Renewable Energy Coalition