

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Review of)
Ohio Adm. Code Chapters 4901:5-1, 4901:5-) Case No. 15-53-GE-ORD
3, 4901:5-5, and 4901:5-7, Regarding Gas)
and Electric Forecasting Rules.)

**MOTION FOR EXTENSION OF TIME TO FILE
COMMENTS
AND
REQUEST FOR EXPEDITED RULING
BY
THE OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

The Office of the Ohio Consumers’ Counsel (“OCC”) moves¹ the Public Utilities Commission of Ohio (“Commission” or “PUCO”) for a forty-five-day extension of time, until February 1, 2016, for all interested persons to file Initial Comments in this proceeding. OCC also requests that Reply Comments be similarly extended from January 8, 2016, to February 22, 2016. OCC also requests an expedited ruling on this Motion.

This Motion should be granted for good cause shown on an expedited basis, for the reasons more fully set forth in the accompanying memorandum in support.

¹ Pursuant to Ohio Adm. Code 4901-1-12(C) and 4901-1-13.

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Kyle L. Kern

Kyle L. Kern (0084199)
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of)
Ohio Adm. Code Chapters 4901:5-1, 4901:5-3,) Case No. 15-53-GE-ORD
4901:5-5, and 4901:5-7, Regarding Gas and)
Electric Forecasting Rules.)

MEMORANDUM IN SUPPORT

Ohio Adm. Code 4901-113(A) allows for continuances and extensions of time to file pleadings and other papers to be granted for good cause shown. Ohio Adm. Code 4901-1-12(C) provides that a party may request an expedited ruling on its motion and that an immediate ruling may be issued if the moving party certifies that no party objects to the issuance of such a ruling.²

On November 18, 2015, the Attorney Examiner issued an Entry setting the procedural schedule for this proceeding. The procedural schedule requires that Initial Comments be filed by December 18, 2015, and Reply Comments be filed by January 8, 2016. OCC now seeks to extend this procedural schedule by forty-five days.³ If this Motion is granted, then Initial Comments would be due on February 1, 2016, and Reply Comments would be due on February 22, 2016. Additionally, because Comments are currently due on December 18, 2015, OCC also requests an expedited ruling on this Motion.

² At the time OCC filed this Motion, no parties had intervened in this docket.

³ Ohio Adm. Code 4901-1-13(A) allows for extensions of time to file pleadings and other papers for good cause shown.

Due to the press of business, which includes a number of proceedings with due dates and activity at or around the same time the comments are due in this case, an extension is necessary. To this end, the PUCO recently issued a procedural schedule for Case No. 12-2050-EL-ORD that is identical to the schedule set forth in this case.⁴ In addition, the PUCO opened a Commission Ordered Investigation in Case No. 15-1594-AU-COI, where comments and reply comments will be permitted. There are also ongoing settlement negotiations and related litigation in the FirstEnergy Electric Security Plan Case, (Case No. 14-1297-EL-SSO), and the Ohio Power Company Power Purchase Agreement Case (Case No. 14-1693-EL-RDR). OCC is involved in all of these matters, and several others, with due dates and activity at or around the same time as the dates established for this proceeding. The current procedural schedule established for this case also happens to fall in the middle of the Holiday season. Thus, good cause exists for the requested extension of the procedural schedule to afford stakeholders time to file comments and fully participate in this proceeding.

For the good cause set forth above, OCC requests that the Commission grant a forty-five-day extension of the procedural schedule in the above-referenced proceeding, whereby Initial Comments will be due on February 1, 2016, and Reply Comments will be due on February 22, 2016. OCC further requests that this Commission rule on an expedited basis.

⁴ See 11/18/2015 Entry in Case No. 12-2050-EL-ORD, establishing that Comments are due on December 18, 2015 and Reply Comments are due on January 8, 2016.

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Kyle L. Kern

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion has been served upon the below-named persons via electronic service this 7th day of December, 2015.

/s/ Kyle L. Kern
Kyle L. Kern
Assistant Consumers' Counsel

SERVICE LIST

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Case No(s). 15-0053-GE-ORD

Summary: Motion Motion for Extension of Time to File Comments and Request for Expedited Ruling by The Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Kern, Kyle L.