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December 18, 2015

Attorney Examiner Greta See
Attorney Examiner Sarah Parrot
Public Utilities Commission of Ohio
180 E. Broad Street, 12th Floor
Columbus, Ohio 43215

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

Dear Attorney Examiners:

On December 16, 2015, the Environmental Law & Policy Center together with several other parties (collectively, "Joint Movants") filed a motion seeking to extend the procedural schedule established by the December 15, 2015 entry in this case. That motion explains that a three-week extension of the procedural schedule is warranted because the entry does not provide adequate time for the parties opposing the December 14, 2015 stipulation to conduct discovery and prepare for a hearing. The Ohio Manufacturers' Association Energy Group ("OMAEG") supports the Joint Movants' request to extend the procedural schedule and urges the attorney examiners to grant the motion to extend the schedule by a minimum of three weeks. The interests of due process strongly favor granting the extension. Given that the stipulation adds several new features, parties must be given sufficient time to serve discovery to understand the factual bases underlying these new features. Moreover, the parties will need adequate time to review testimony supporting the stipulation and discovery so that the information can be analyzed and addressed in testimony filed in opposition to the stipulation. The current procedural schedule does not adequately account for these important interests and thwarts due process.

Additionally, the undersigned is counsel of record for OMAEG in this case and trial counsel in no less than three other cases that are scheduled for hearing before the Commission in the month of January. All of these cases were scheduled for hearing before the December 15, 2015 scheduling entry was issued in this case. The accelerated procedural schedule established in this case, as well as the time and attention that will be required to prepare for other cases, will put a severe strain on the undersigned's resources and limit the amount of

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time that can be dedicated to preparing a case in opposition to the December 14, 2015 stipulation.

For all the reasons set forth in the Joint Movants' motion, as well as the reasons set forth herein, the procedural schedule in this case should be extended, at a minimum, by three weeks to afford adequate preparation time and due process to the parties.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly W. Bojko".

Kimberly W. Bojko

Counsel for the OMAEG

cc: Parties of Record

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/18/2015 11:20:45 AM

in

Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM

Summary: Correspondence electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group