

**Legal Department** 

March 30, 2016

Attorney Examiner Greta See Attorney Examiner Sarah Parrot Public Utilities Commission of Ohio 180 East Broad Street Columbus Ohio 43215-3793

Steven T. Nourse Senior Counsel – Regulatory Services (614) 716-1608 (P) (614) 716-2014 (F) stnourse@aep.com 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, Case No. 14-1693-EL-RDR; In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority, Case No. 14-1694-EL-AAM

## **Dear Attorney Examiners:**

Earlier today, Noble Americas Energy Solutions LLC (Noble) filed a motion to stay proceedings. Noble's motion endorses –and largely mirrors – the prior motion to stay filed by a group of parties on March 21, 2016. Noble's motion is an untimely attempt to join the March 21 motion of other parties that is redundant and reflects its unduly litigious approach. Further, Noble's motion is premised upon a complaint filed before the Federal Energy Regulatory Commission in Docket No. EL16-34-000 and references the complaint (on page 2) as being attached as Exhibit A to its motion – yet the complaint was not attached or otherwise properly cited in Noble's motion. Moreover, Noble's motion is simply untimely as being filed after a decision on the merits has been announced for the Commission's March 31, 2016 agenda. In addition, for all of the reasons contained in the memorandum filed by Ohio Power Company (AEP Ohio) on March 23, 2016 in opposition to the March 21 motion to stay, Noble's motion should be denied.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

cc: Parties of Record

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in

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

Summary: Correspondence -Letter to Attorney Examiners (Noble Motion) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company