# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of

Case No. 16-0395-EL-SSO

The Dayton Power and Light Company for

Approval of Its Electric Security Plan

.

In the Matter of the Application of

The Dayton Power and Light Company for

Approval of Revised Tariffs

Case No. 16-0396-EL-ATA

:

In the Matter of the Application of

The Dayton Power and Light Company for Approval of Certain Accounting Authority

Pursuant to Ohio Rev. Code § 4905.13

Case No. 16-0397-EL-AAM

UNOPPOSED MOTION OF THE DAYTON POWER AND LIGHT COMPANY FOR EXTENSION OF TIME TO FILE REPLY MEMORANDUM REGARDING DP&L'S MOTION TO IMPLEMENT THE SSR EXTENSION RIDER

#### **EXPEDITED RULING REQUESTED**

Pursuant to Ohio Admin. Code § 4901-1-13(A), The Dayton Power and Light Company ("DP&L") requests a 7-day extension of time to file its Reply on its motion to implement the SSR Extension Rider. With the 7-day extension, DP&L's filing deadline would be Friday, May 13, 2016.

This motion is not opposed by the parties who filed oppositions to DP&L's motion to implement the SSR-E.

## Respectfully submitted,

## /s/ Charles J. Faruki

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#### MEMORANDUM IN SUPPORT OF THE UNOPPOSED MOTION OF THE DAYTON POWER AND LIGHT COMPANY FOR EXTENSION OF TIME TO FILE REPLY MEMORANDUM REGARDING DP&L'S MOTION TO IMPLEMENT THE SSR EXTENSION RIDER

The Commission should grant DP&L a short 7-day extension of time, until May 13, 2106, to respond to the oppositions that were filed to DP&L's motion to implement the SSR-E, for two reasons. First, the oppositions are voluminous and address numerous technical issues. DP&L needs time to analyze the issues raised in the oppositions and to craft an appropriate reply. Second, the SSR-E would go into effect (if ever) on January 1, 2017. The 7-day extension of time thus would not interfere with the Commission's ability to decide DP&L's motion on a timely basis.

DP&L's motion is not opposed by the following parties which filed oppositions to DP&L's motion to implement the SSR-E: Industrial Energy Users-Ohio, The City of Dayton, Honda of American Mfg., Inc., the Kroger Co., Ohio Manufacturers' Association Energy Group, Ohio Partners for Affordable Energy, The Office of the Ohio Consumers' Counsel and the Ohio Energy Group.

#### Respectfully submitted,

#### /s/Charles J. Faruki

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#### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Unopposed Motion of The Dayton Power and Light Company for Extension of Time to File Reply Memorandum Regarding DP&L's Motion to Implement the SSR Extension Rider **EXPEDITED RULING REQUESTED** has been served via electronic mail upon the following counsel of record, this 3rd day of May, 2016:

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Summary: Motion Unopposed Motion of The Dayton Power and Light Company for Extension of Time to File Reply Memorandum Regarding DP&L's Motion to Implement the SSR Extension Rider - Expedited Ruling Requested electronically filed by Mr. Charles J. Faruki on behalf of The Dayton Power and Light Company