#### **BEFORE** THE PUBLIC UTILITIES COMMISSION OF OHIO

in the Matter of the Application of Ohio	)	
Power Company for Authority to Establish a	)	
Standard Service Offer Pursuant to R.C.	)	Case No. 16-1852-EL-SSO
4928.143, in the Form of an Electric	)	
Security Plan.	)	
In the Matter of the Application of Ohio	)	
Power Company for Approval of Certain	)	Case No. 16-1853-EL-AAM
Accounting Authority.	)	

#### OHIO POWER COMPANY'S MOTION FOR CONTINUANCE AND REQUEST FOR EXPEDITED RULING

Pursuant to Rules 4901-1-12 and 4901-1-32, Ohio Administrative Code, Ohio Power Company ("Ohio Power" or the "Company") respectfully moves that the Commission continue the deadline for refiling its Electric Security Plan to October 28, 2016. The Company requests that the continuance be considered on an expedited basis pursuant to O.A.C. 4901-1-12(C). A memorandum in support of the items in this motion is attached.

Respectfully submitted,

<u>/s/ Steven T. Nourse</u>

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**Counsel for Ohio Power Company** 

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# OHIO POWER COMPANY'S MEMORANDUM IN SUPPORT OF THE MOTION FOR CONTINUANCE

On September 7, 2016, the Attorney Examiner issued an entry directing Ohio Power Company ("Ohio Power" or the "Company") to refile its Electric Security Plan (ESP) in this new docket. Given that directive and the passage of time since the original filing was made, AEP Ohio has begun the process of thoroughly reviewing and updating its proposed modifications to, and extension of, the existing ESP. In order to conduct that exercise and attempt to avoid further modifications after refiling the Application, the Company requests additional time and requests a continuance until October 28, 2016. Given the impending deadline, the Company requests an expedited ruling.

Respectfully submitted,

\_/s/ Steven T. Nourse
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**Counsel for Ohio Power Company** 

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of *Ohio Power Company's Motion for Continuance* upon counsel for all other parties of record in this case, on this 16th day of September, 2016.

/s/ Steven T. Nourse Steven T. Nourse This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

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in

Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

Summary: Motion electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company