

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for Approval of Full Legal Corporate Separation and Amendment to Its Corporate Separation Plan))))))	Case No. 12-1126-EL-UNC
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**OHIO POWER COMPANY’S MOTION TO SUSPEND
OR FOR EXTENSION OF PROCEDURAL SCHEDULE
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 4901-1-13(A) of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio” or the “Company”) respectfully moves the Commission to suspend and/or indefinitely extend the procedural schedule in this case in light of continuing settlement discussions in the related *ESP III Extension* proceeding, Case Nos. 16-1852-EL-SSO, *et al.* The outcome of the discussions in the *ESP III Extension* case may resolve one or more relevant issues in this case and render AEP Ohio’s present application unnecessary or, at a minimum, delay the parties’ need to expend time and money preparing comments in this docket. Accordingly, AEP Ohio requests that the deadlines for initial and reply comments in this case be suspended unless or until AEP Ohio files a future motion in this docket to resume these proceedings.

The grounds for this motion are set forth more fully in the attached memorandum in support. Pursuant to Ohio Adm. Code 4901-1-12(C), the Company requests expedited ruling on this motion.

Respectfully submitted,

/s/ Steven T. Nourse

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MEMORANDUM IN SUPPORT

Rule 4901-1-13(A) of the Ohio Administrative Code permits the Commission to grant “extensions of time to file pleadings or other papers * * * upon motion of any party for good cause shown.” AEP Ohio respectfully submits that good cause exists to suspend this proceeding and indefinitely extend the deadlines for initial and reply comments until further notice.

On April 7, 2017, AEP Ohio filed an application to amend its corporate separation plan in this docket. Specifically, the Company has requested authority to narrowly amend its corporate separation plan to eliminate the conditions requiring liquidation of the energy from the its OVEC entitlements to facilitate the Company’s use of the OVEC entitlements to serve a portion of standard service offer (SSO) load, as it has proposed in its pending *ESP III Extension* case, Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM. On April 13, 2017, the Attorney Examiner issued an Entry that established deadlines of June 23, 2017, and July 10, 2017 for filing initial and reply comments on AEP Ohio’s application.

On June 6, 2017, the Attorney Examiner issued an Entry in the *ESP III Extension* case, continuing the evidentiary hearing in that proceeding from June to August 8, 2017, in order to afford the parties sufficient time to fully explore settlement discussions in that proceeding. On June 14, 2017, AEP Ohio moved for an extension of the procedural schedule in this case in order to align with the revised procedural schedule in the *ESP III Extension* case. On June 20, 2017, the Attorney Examiner issued an Entry granting that motion and extending the deadlines for initial and reply comments in this proceeding to August 25, 2017 and September 11, 2017, respectively.

Since the Attorney Examiner’s last Entry, productive settlement discussions have continued in the *ESP III Extension* case, and numerous, but not all, of the parties to that

proceeding have reached a settlement in principle. (*See ESP III Extension*, Staff Mot. for Continuance at 2 (Aug. 2, 2017).) The Company's proposal to use its OVEC entitlements to serve SSO customers, which necessitated the Company's application in this proceeding, is among the issues that may be resolved through the settlement of the *ESP III Extension* case. Settlement of the *ESP III Extension* case thus may render AEP Ohio's application in this proceeding unnecessary – and at a minimum, it would delay the parties' need to expend time and money preparing comments in this docket.

Good cause exists to suspend and/or indefinitely extend the procedural schedule in this case so that the parties to this proceeding do not expend potentially unnecessary time and incur potentially unnecessary expense commenting on an application that AEP Ohio may withdraw depending on the outcome of the *ESP III Extension* case. Expedited ruling on this motion is appropriate for the same reasons. Accordingly, AEP Ohio respectfully requests that the Attorney Examiner suspend the deadline for initial comments on AEP Ohio's April 7, 2017 application unless or until AEP Ohio files a future motion in this docket to resume these proceedings.

Respectfully submitted,

/s/ Steven T. Nourse

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Adm. Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. I hereby certify that a service copy of the foregoing *Ohio Power Company's Motion to Suspend or for Extension of Procedural Schedule* was served upon the following parties of record this 3rd day of August, 2017, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

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Summary: Motion - Ohio Power Company's Motion to Suspend or for Extension of Procedural Schedule and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company