

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )	
The Dayton Power and Light Company for )	Case No. 16-395-EL-SSO
Approval of Its Electric Security Plan )	

In the Matter of the Application of )	
The Dayton Power and Light Company for )	Case No. 16-396-EL-ATA
Approval of Revised Tariffs )	

In the Matter of the Application of )	
The Dayton Power and Light Company for )	Case No. 16-397-EL-AAM
Approval of Certain Accounting Authority )	
Pursuant to Ohio Rev. Code § 4905.13 )	

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**JOINT MOTION OF INDUSTRIAL ENERGY USERS-OHIO, IGS,  
OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP, AND  
DAYTON POWER AND LIGHT COMPANY FOR AN ORDER CONTINUING  
THE FILING DATE FOR MEMORANDA CONTRA AND REQUEST FOR AN  
EXPEDITED ORDER  
AND  
MEMORANDUM IN SUPPORT**

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**NOVEMBER 21, 2017**

**BEFORE  
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REQUEST FOR AN EXPEDITED ORDER**

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Under Rule 4901-1-12, Ohio Administrative Code, Industrial Energy Users-Ohio, IGS, Ohio Manufacturers' Association Energy Group, and The Dayton Power and Light Company ("Joint Movants") move for an order continuing the reply date for memoranda contra applications for rehearing from November 30, 2017 to December 4, 2017. Further, the Joint Movants request an expedited decision of this Motion. The reasons supporting the Motion and request for expedited decision are set out in the accompanying memorandum.

Respectfully submitted,

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**BEFORE  
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**MEMORANDUM IN SUPPORT**

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The Public Utilities Commission of Ohio issued an Opinion and Order in this case on October 20, 2017. On November 20, 2017, several parties filed applications for rehearing. Under Rule 4901-1-35(B), a party to this proceeding may file a memorandum contra by no later than November 30, 2017.

The Thanksgiving holiday falls in the middle of the time for the preparation of the memoranda contra. Further, several parties including three of the Joint Movants are also involved in negotiations involving rate and electric security plan cases with Duke Energy Ohio.

Due to the holiday and the overlapping cases, the Joint Movants request additional time to prepare memoranda contra. The availability of the additional four days should not unduly affect the Commission's schedule and will afford the parties sufficient time to address the merits of the applications.

The Joint Movants also request that the Commission issue an expedited decision as provided by Rule 4901-1-12(C). Because the motion requests an extension of less than five days, the Commission issue a decision without the filing of memoranda. *Id.* Nonetheless, the parties have been contacted, and none has registered an objection to the request for an expedited order.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Joint Motion of Industrial Energy Users-Ohio, IGS, Ohio Manufacturers' Association Energy Group, and The Dayton Power and Light Company for an Order Continuing the Filing Date for Memoranda Contra and Request for an Expedited Order and Memorandum In Support* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 21<sup>st</sup> day of November 2017, *via* electronic transmission.

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Summary: Motion Joint Motion of Industrial Energy Users-Ohio, IGS, Ohio Manufacturers' Association Energy Group, and The Dayton Power and Light Company for an Order Continuing the Filing Date for Memoranda Contra and Request for an Expedited Order and Memorandum In Support electronically filed by Mr. Frank P Darr on behalf of Industrial Energy Users-Ohio