

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Long-Term Forecast :
Report of Ohio Power Company and : Case No. 18-501-EL-FOR
Related Matters ::

**MOTION FOR A HEARING AND MEMORANDUM IN SUPPORT
SUBMITTED ON BEHALF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Comes now the Staff of the Public Utilities Commission of Ohio (Staff) and respectfully requests this Commission to (1) hold a hearing in the above-referred case and (2) schedule the hearing within ninety days of September 19, 2018 but to call and continue that hearing to allow sufficient time for investigation and settlement discussions for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ *Thomas W. McNamee*

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MEMORANDUM IN SUPPORT

The Amendment to the 2018 Long Term Forecast Report of the American Electric Power Company (AEP) filed in this case on September 19, 2018 seeks a need determination for purposes of R.C. 4928.143(B)(2)(c) for 900 megawatts of renewable generation facilities in the State. The question presented is relatively novel, complex, and is likely to attract considerable public interest. Such facilities would potentially have very significant consequences, financial and environmental, for decades. Staff believes that these factors constitute good cause for purposes of requiring a hearing under R.C. 4935.04(D)(3).

Given that the outcome of this application would have very significant consequences and the question presented is one the Commission has rarely addressed, the Commission itself and all parties would benefit by a full development of the facts of the situation. This necessitates discovery and an opportunity for discussions. Accomplishing this development in a complete fashion within 90 days does not appear feasible. Therefore the Staff requests that the Commission set a hearing within the ninety days required by R.C. 4928.143(D)(3) but call and continue that hearing to allow the time needed to fully develop the record in this complicated and relatively novel case.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ *Thomas W. McNamee*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Motion for a Hearing and Memorandum submitted on behalf of the Public Utilities Commission of Ohio has been served upon the below-named counsel via electronic mail, this 21st day of September, 2018.

/s/ *Thomas W. McNamee*

Thomas W. McNamee

Parties of Record:

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Summary: Motion For a Hearing and Memorandum in Support electronically filed by Ms. Tonneta Scott on behalf of PUC