

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company to Increase Its Rates for Electric Distribution	:	CASE NO. 20-1651-EL-AIR
	:	
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority	:	CASE NO. 20-1652-EL-AAM
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	:	CASE NO. 20-1653-EL-ATA
	:	

**MOTION OF THE DAYTON POWER AND LIGHT COMPANY D/B/A AES OHIO
FOR A BRIEF CONTINUANCE OF THE EVIDENTIARY HEARING SET TO
COMMENCE ON OCTOBER 26, 2021**

EXPEDITED RULING REQUESTED

Pursuant to Ohio Adm.Code 4901-1-13(A) and for good cause shown, The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio" or the "Company") moves for a brief continuance of approximately 30 days of the evidentiary hearing currently set to commence on October 26, 2021, and for a corresponding extension of the deadlines for Staff to file testimony, for the parties to exchange exhibits, and for the parties to file motions to strike. Aug. 9, 2021 Entry, ¶ 6. AES Ohio, Staff, and various intervenors have been actively engaged in settlement negotiations over the past two months, and additional time is necessary for the parties to explore whether a settlement can be achieved.

Pursuant to Ohio Adm.Code 4901-1-12(C), AES Ohio requests an expedited ruling on this Motion. AES Ohio contacted counsel for all parties at 8:17 AM on Thursday, October 14, 2021 to inform them that the Company would request this continuance and seek an

expedited ruling. AES Ohio then circulated a draft copy of this Motion at 7:49 AM on Friday, October 15, 2021 and inquired whether any party would object to the relief requested or expedited treatment. AES Ohio certifies that as of the filing of this Motion, no parties have expressed any objection to the relief requested or expedited treatment, and that Staff, The Office of the Ohio Consumers' Counsel, the City of Dayton, Ohio Energy Group, Ohio Manufacturers' Association Energy Group, The Kroger Company, Walmart Inc., Ohio Partners for Affordable Energy, IGS Energy, Environmental Law & Policy Center, Ohio Environmental Council, Ohio Hospital Association, Direct Energy Business LLC, Direct Energy Services, LLC, and One Energy Enterprises, LLC expressly stated their non-opposition.

Respectfully submitted,

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(willing to accept service by e-mail)

**MEMORANDUM IN SUPPORT OF MOTION OF THE DAYTON POWER AND
LIGHT COMPANY D/B/A AES OHIO FOR A BRIEF CONTINUANCE OF THE
EVIDENTIARY HEARING SET TO COMMENCE ON OCTOBER 26, 2021**

On November 30, 2020, AES Ohio filed its Application in this proceeding pursuant to R.C. 4909.18 to increase its rates for electric distribution service. Following its investigation of the Company's Application pursuant to R.C. 4909.19, Staff issued its Staff Report on July 26, 2012. The Commission, thereafter, scheduled an evidentiary hearing to commence on October 26, 2021. Aug. 9, 2021 Entry, ¶ 6.

Since the issuance of the Staff Report, AES Ohio, Staff, and the parties have engaged in numerous discussions to determine whether a stipulation can be reached pursuant to Ohio Adm.Code 4901-1-30. To facilitate and continue those efforts, AES Ohio moves for a brief continuance of the evidentiary hearing by approximately 30 days, and for a corresponding extension of the deadlines for Staff to file testimony, for the parties to exchange exhibits, and for the parties to file motions to strike. Ohio Adm.Code 4901-1-13(A). Accord: Jan. 21, 2016 Entry, In re Duke Energy Ohio, Inc., Case No. 14-2209-EL-ATA (granting a 30-day extension for the parties to pursue settlement).

Pursuant to Ohio Adm.Code 4901-1-12(C), AES Ohio requests an expedited ruling on this Motion. AES Ohio contacted counsel for all parties at 8:17 AM on Thursday, October 14, 2021 to inform them that the Company would request this continuance and seek an expedited ruling. AES Ohio then circulated a draft copy of this Motion at 7:49 AM on Friday, October 15, 2021 and inquired whether any party would object to the relief requested or expedited treatment. AES Ohio certifies that as of the filing of this Motion, no parties have expressed any objection to the relief requested or expedited treatment, and that Staff, The Office

of the Ohio Consumers' Counsel, the City of Dayton, Ohio Energy Group, Ohio Manufacturers' Association Energy Group, The Kroger Company, Walmart Inc., Ohio Partners for Affordable Energy, IGS Energy, Environmental Law & Policy Center, Ohio Environmental Council, Ohio Hospital Association, Direct Energy Business LLC, Direct Energy Services, LLC, and One Energy Enterprises, LLC expressly stated their non-opposition.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion of The Dayton Power and Light Company d/b/a AES Ohio for a Brief Continuance of the Evidentiary Hearing Set to Commence on October 26, 2021 has been served via electronic mail upon the following counsel of record, this 15th day of October, 2021:

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Summary: Motion Motion of The Dayton Power and Light Company d/b/a AES Ohio for a Brief Continuance of the Evidentiary Hearing Set to Commence on October 26, 2021 *EXPEDITED RULING REQUESTED* electronically filed by Mr. Jeffrey S. Sharkey on behalf of The Dayton Power and Light Company