

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates.)	Case No. 20-585-EL-AIR
)	
In the Matter of the Application of Ohio Power Company for Tariff Approval.)	Case No. 20-586-EL-ATA
)	
In the Matter of the Application of Ohio Power Company for Approval to Change Accounting Methods.)	Case No. 20-587-EL-AAM
)	

**OHIO POWER COMPANY’S MOTION FOR AN EXTENTION OF TIME
TO FILE MEMORANDA IN OPPOSITION TO APPLICATIONS FOR REHEARING
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Adm.Code 4901-1-13(A) and for good cause shown, Ohio Power Company (“AEP Ohio” or “the Company”) moves for an extension of time of 3 days, i.e. until and through December 30, 2021, for parties to file memoranda in opposition to the Applications for Rehearing filed by Nationwide Energy Partners, LLC and Interstate Gas Supply, Inc., on December 17, 2021 regarding the Public Utilities Commission of Ohio’s (“the Commission”) November 17, 2021 Opinion and Order. Pursuant to Ohio Adm.Code 4901-1-12(C), AEP Ohio requests an expedited ruling on this Motion.

Respectfully submitted,

/s/ Steven T. Nourse

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MEMORANDUM IN SUPPORT

On December 17, 2021, Nationwide Energy Partners, LLC (“NEP”) and Interstate Gas Supply, Inc. (“IGS”) filed applications for rehearing related to the November 17, 2021 Opinion and Order in this proceeding. By operation of administrative rule, memoranda in opposition to applications for rehearing shall be filed within 10 days. Ohio Adm.Code 4901-1-35(B). In light of the intervening holiday and the various issues raised by NEP and IGS, there is good cause for the Commission to grant a very brief extension of the period of time for parties to file a memoranda in opposition to the applications for rehearing by 3 days, i.e. until and through December 30, 2021. Ohio Adm.Code 4901-1-13(A). Indeed, the Commission has granted similar reasonable requests.¹ Like previous extensions of time, such a minor extension will not prejudice any party to this case and should have no material impact on the Commission’s ability to rule on the applications for rehearing by the statutory deadline of January 17, 2022.

Pursuant to Ohio Adm.Code 4901-1-12(C), AEP Ohio requests an expedited ruling on this Motion. Due to time constraints and the interest in filing this request quickly, AEP Ohio is not able to certify that it contacted the parties and received no objections to the issuance of an expedited ruling.

Respectfully submitted,

/s/ Steven T. Nourse

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¹ Case No. 08-1094-EL-SSO, *et al.*, Entry at ¶ 17 (July 22, 2021) (granting extension of *four days* to file memorandum contra to application for rehearing); Case No. 08-1094-EL-SSO, *et al.*, Entry at ¶ 15 (January 27, 2020) (granting extension of *seven days* to file memorandum contra to application for rehearing); Case No. 16-395-EL-SSO, *et al.*, Entry at ¶ 9 (January 27, 2019) (granting extension of *ten days* to file memorandum contra to application for rehearing due substantially to December holidays).

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CERTIFICATE OF SERVICE

I hereby certify that a service copy of the foregoing was sent by, or on behalf of, the undersigned counsel to the following parties of record this 20th day of December, 2021, via electronic transmission.

/s/ Steven T. Nourse

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Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Motion MOTION FOR AN EXTENTION OF TIME TO FILE
MEMORANDA IN OPPOSITION TO APPLICATIONS FOR REHEARING AND
REQUEST FOR EXPEDITED RULING electronically filed by Mr. Steven T. Nourse
on behalf of Ohio Power Company