

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company to)	20-1651-EL-AIR
Increase Its Rates for Electric Distribution)	
 In the Matter of the Application of The)	
Dayton Power and Light Company for)	20-1652-EL-AAM
Accounting Authority)	
 In the Matter of the Application of The)	
Dayton Power and Light Company for)	20-1653-EL-ATA
Approval of Revised Tariffs)	

**JOINT MOTION FOR CONTINUANCE
AND REQUEST FOR EXPEDITED CONSIDERATION**

Dayton Power and Light Company d/b/a AES Ohio (“AES Ohio”), Staff of the Public Utilities Commission of Ohio, the Ohio Energy Group, The Kroger Co., The Ohio Manufacturers’ Association Energy Group, the University of Dayton, the Industrial Energy Users-Ohio, Ohio Partners for Affordable Energy, The Ohio Hospital Association, Walmart Inc., Direct Energy Business LLC and Direct Energy Services, LLC, One Energy Enterprises, LLC, and The City of Dayton jointly “Movants,” respectfully request that the dates for the filing of Staff testimony and beginning the evidentiary hearing in this matter be continued from the currently scheduled dates of December 28, 2021, to January 18, 2022 (testimony), and January 5, 2022, to January 24, 2022 (hearing), respectively, and for a corresponding extension of the deadlines for the parties to exchange exhibits to January 20, 2022, and for the parties to file motions to strike to January 21, 2022, at 1:00 p.m. The Office of the Ohio Consumers’ Counsel and

IGS Energy do not oppose this Motion. Nationwide Energy Partners, ChargePoint, Inc, and the Ohio Environmental Counsel were contacted but provided no response.

Movants make this request pursuant to Ohio Administrative Code Section 4901-1-13(A) to allow Staff and the parties, who have been and continue to be actively engaged in settlement discussions and exchanging proposed settlement terms, some additional time to prepare for hearing in the event the parties can not settle the case. All parties have been participating in settlement negotiations and additional time is necessary for the parties to share their final positions and determine whether a settlement can be reached.

Pursuant to O.A.C. Section 4901-1-12(C), Movants further request an expedited ruling on this motion. Staff counsel circulated a draft copy of this motion and asked whether any party objected to the relief requested or the expedited treatment. All parties in the case were given a draft of the motion and while the majority of parties supported the Motion, IGS and the Office of the Ohio Consumer's Counsel did not oppose. No response was provided by Nationwide Energy Partners, ChargePoint, Inc. nor the Ohio Environmental Council.

WHEREFORE, Movants respectfully request that the dates for the filing of Staff testimony, to begin the evidentiary hearing in this matter, and to exchange exhibits and file motions to strike, be continued as requested.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

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. Staff, pursuant to R.C. 4909.19 issued its Report on October 26, 2021. After the issuance of the Staff Report, all parties, including Staff and AES Ohio, engaged in numerous discussions in order to reach a settlement in accordance with Ohio Adm.Code 4901-1-30. To date, no settlement agreement has been achieved but the parties continue to negotiate and give concessions on their respective positions. In addition to settling this distribution case, Parties are also attempting to resolve several other cases; thereby, leading to complex negotiations. In order to allow for the parties to exchange their final settlement offers and discuss their final positions in working towards a settlement, Movants request a continuance of the evidentiary hearing to January 24, 2022, and an extension of the deadlines for Staff to file testimony to January 18, 2022, for the parties to exchange exhibits to January 20, 2022, and for the parties to file motions to strike to January 21, 2022, at 1:00 p.m.

In addition, the Movants, pursuant to Ohio Adm.Code 4901-1-12(C), request an expedited ruling on this Motion. No parties objected to the request for expedited treatment.

Respectfully submitted,

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Continuance**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via regular U.S. or electronic mail upon the below parties of record, this 20th day of December 2021.

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Jodi Bair

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**Summary: Motion Joint Motion for Continuance and Request for Expedited
Consideration electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO**