**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Proposed Modifications to the Electric Distribution Utilities’ Standard Service Offer Procurement Auctions. | )))) | Case No. 23-781-EL-UNC |

**MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS**

**AND**

**REQUEST FOR EXPEDITED RULING**

**BY**

**OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

The Office of the Ohio Consumers’ Counsel (“OCC”) moves for a four-day extension of time until September 15, 2023 for parties to file Reply Comments that are currently due on September 11, 2023. O.A.C. 4901-1-13(A) allows extensions for good cause. While this motion applies to any stakeholder filing Reply Comments, OCC’s good cause is that completion of the Reply Comments overlaps with active settlement negotiations in other matters before the PUCO involving one or more of OCC’s counsel in this case. This is in addition to the usual press of OCC’s utility regulatory business for consumers. Moreover, the issues needing attention and time to address for consumers are complicated and not typical.

OCC requests an expedited ruling on this motion. Since this motion is for five days or less, O.A.C. 4901-1-12(C) allows for an immediate ruling by the PUCO. OCC is unable to certify that other parties do not oppose an expedited ruling.

The grounds for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

Bruce Weston (0016973)

Ohio Consumers’ Counsel

*/s/ Donald J. Kral*

Donald J. Kral (0042091)

Counsel of Record

Assistant Consumers’ Counsel

Angela D. O’Brien (0097579)

Deputy Consumers’ Counsel

**Office of the Ohio Consumers’ Counsel**

65 East State Street, Suite 700

Columbus, Ohio 43215

Telephone: [Kral]: (614) 466-9571

Telephone: [O’Brien]: (614) 466-9531

donald.kral@occ.ohio.gov

angela.obrien@occ.ohio.gov

(willing to accept service by e-mail)

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Proposed Modifications to the Electric Distribution Utilities’ Standard Service Offer Procurement Auctions. | )) Case No. 23-781-EL-UNC)) |  |

**MEMORANDUM IN SUPPORT**

The determination of whether and/or how to set a proxy rate as proposed by PUCO Staff in this matter is very important to all Ohioans. The Office of the
Ohio Consumers’ Counsel (“OCC”) moves for a short four-day extension of time, until September 15, 2023, for stakeholders to file reply comments that are currently due to be filed on September 11, 2023.

O.A.C. 4901-1-13(A) allows extensions for good cause. While this motion applies to any party filing testimony, OCC’s good cause is that the completion of the Reply Comments overlaps with active settlement negotiations in other matters presently before the PUCO involving one or more of OCC’s counsel in this case. This is in addition to the usual press of OCC’s utility regulatory business for consumers. Moreover, the issues needing attention and time to address for consumers are complicated and not typical.

Granting four additional days for the filing of Reply Comments would allow the parties additional time to prepare more substantive responses to the Comments submitted by the other interested stakeholders regarding the PUCO Staff’s proposal for standard service offer procurement auctions.

For the reasons explained above, there is good cause for the PUCO to grant this motion. OCC requests an expedited ruling on this motion. Since this motion is to file the Reply Comments in five days or less, O.A.C. 4901-1-12(C) allows an immediate ruling. OCC is unable to certify that other parties do not oppose an expedited ruling.

Respectfully submitted,

Bruce Weston (0016973)

Ohio Consumers’ Counsel

*/s/ Donald J. Kral*

Donald J. Kral (0042091)

Counsel of Record

Assistant Consumers’ Counsel

Angela D. O’Brien (0097579)

Deputy Consumers’ Counsel

**Office of the Ohio Consumers’ Counsel**

65 East State Street, Suite 700

Columbus, Ohio 43215

Telephone: [Kral]: (614) 466-9571

Telephone: [O’Brien]: (614) 466-9531

donald.kral@occ.ohio.gov

angela.obrien@occ.ohio.gov

(willing to accept service by e-mail)

**CERTIFICATE OF SERVICE**

 I hereby certify that a copy of this Motion for Extension of Time to File Reply Comments and Request for Expedited Ruling was served on the persons stated below via electronic transmission, this 8th day of September, 2023.

 */s/ Donald J. Kral*

 Donald J. Kral

 Assistant Consumers’ Counsel

The PUCO’s e-filing system will electronically serve notice of the filing of this document on the following parties:

**SERVICE LIST**

|  |  |
| --- | --- |
| John.jones@ohioAGO.govrocco.dascenzo@duke-energy.comjeanne.kingery@duke-energy.comlarisa.vaysman@duke-energy.comelyse.akhbari@duke-energy.comcwatchorn@firstenergycorp.comAttorney Examiners:Matthew.sandor@puco.ohio.govClint.white@puco.ohio.gov | evan.betterton@igs.comchristopher.hollon@aes.comglpetrucci@vorys.comassanyal@vorys.commpritchard@mcneeslaw.comawalke@mcneeslaw.comstnourse@aep.com |
|  |  |