

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2007 AUG 31 PM 5:00
PUCO

In the Matter of the Application)
of Columbus Southern Power Company and)
Ohio Power Company for Authority to)
Recover Costs Associated with the) Case No. 05-376-EL-UNC
Construction and Ultimate Operation of an)
Integrated Gasification Combined Cycle)
Electric Generating Facility.)

**MOTION FOR EXTENSION OF TIME TO FILE MEMORANDUM CONTRA TO
COLUMBUS SOUTHERN POWER COMPANY'S AND OHIO POWER
COMPANY'S MOTION TO EXTEND PROTECTIVE ORDER
AND REQUEST FOR EXPEDITED RULING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

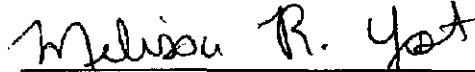
Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13, the Office of the Ohio Consumers' Counsel ("OCC") moves the Public Utilities Commission of Ohio ("PUCO" or "Commission") for a four-day extension of time to file a Memorandum Contra to Columbus Southern Power Company's and Ohio Power Company's Motion to Extend Protective Order in this proceeding. If OCC's motion is granted, its Memorandum Contra will be due September 11, 2007, instead of September 7, 2007.

OCC requests an expedited ruling on this motion, pursuant to Ohio Adm. Code 4901-1-12(C). Pursuant to that Rule, the Commission may rule upon requests for extensions of five days or less, without waiting for parties to file responsive memoranda. OCC's motion and request should be granted, for the reasons explained in the following memorandum.

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Respectfully submitted,

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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of Columbus Southern Power Company and)	
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MEMORANDUM IN SUPPORT

The Commission has before it a Motion to Extend Protective Order, filed by Columbus Southern Power Company and Ohio Power Company on August 23, 2007. General Electric Company, GE Energy (USA), LLC, Bechtel Corporation, and Bechtel Power Corporation's (together "GE/Bechtel") also filed a Motion to Extend This Commission's April 10, 2006 Protective Order, on August 27, 2007. Presently, OCC's Memorandum Contra to Columbus Southern Power's and Ohio Power Company's Motion to Extend Protective Order is due September 7, 2007, and OCC's Memorandum Contra to GE/Bechtel's Motion to Extend This Commission's April 10, 2006 Protective Order is due September 11, 2007.

It has developed that OCC's Counsel of Record, who was principally involved in this case for OCC, is presently out of the office with family, and is not scheduled to return to the office until September 10, 2007. In addition, judicial efficiency would be served if OCC were allowed to submit a single combined Memorandum Contra to the pending GE/Bechtel and Columbus Southern Power Company's and Ohio Power Company's motions. Given these circumstances, OCC requests a minimal extension of

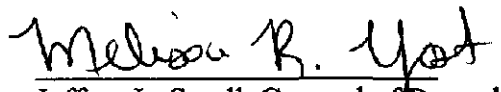
four days to its September 7, 2007 deadline to respond to the Columbus Southern Power Company's and Ohio Power Company's motion. If OCC's motion is granted, OCC will file its combined Memorandum Contra to the pending GE/Bechtel and Columbus Southern Power Company's and Ohio Power Company's motions on or before September 11, 2007.

Given the impending due date of its Memorandum Contra to the Columbus Southern Power's and Ohio Power Company's Motion to Extend Protective Order, OCC requests an expedited ruling on the instant motion, pursuant to Ohio Adm. Code 4901-1-12(C). Under that Rule, a ruling on OCC's motion for an extension of four days can be granted without the PUCO waiting for the filing of responsive memoranda.

For the above-stated reasons, OCC's Motion for Extension of Time to File Memorandum Contra and Request for Expedited Ruling should be granted.

Respectfully submitted,

JANINE MIGDEN-OSTRANDER
CONSUMERS' COUNSEL

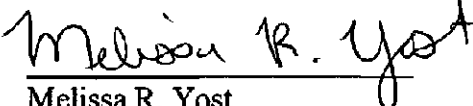

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CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Motion for Extension of Time to File Memorandum Contra and Request for Expedited Ruling and Memorandum in Support by the Office of the Ohio Consumers' Counsel was served by first class United States Mail, postage prepaid, and/or by electronic mail to the persons listed below on this 31st day of August, 2007.


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