

FILE

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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Protocols for the)
Measurement and Verification of Energy) Case No. 09-512-GE-UNC
Efficiency and Peak Demand Reduction)
Measures)

JOINT MOTION OF ELECTRIC UTILITIES
FOR EXPEDITED CONSIDERATION AND
FOR 30 DAY EXTENSION OF TIME TO FILE VALUES AND PROTOCOLS

Pursuant to Rule 4901-1-13, The Dayton Power and Light Company, Columbus Southern Power Company, Ohio Power Company, Ohio Edison Company, Duke Energy Ohio, Inc., The Toledo Edison Company, and The Cleveland Electric Illuminating Company (together the "Electric Utilities") jointly submit this Joint Motion of Electric Utilities for Expedited Consideration and for 30 Day Extension of Time to File Values and Protocols to extend the deadline for filing proposed values and protocols from September 15, 2009, to October 15, 2009. In support thereof, the Electric Utilities state as follows:

1. On June 28, 2009, the Commission issued an Entry in this docket establishing a procedural schedule that among other things required the Electric Utilities to try to reach a consensus on a list of energy efficiency measures and programs for a filing to be made on August 3, 2009. That filing was to be followed six weeks later on September 15, 2009, with a filing that would be a consensus recommendation for the values and protocols that could be applied to compute deemed energy savings for each of measures and programs listed in the August 3, 2009 filing.

2. The Electric Utilities diligently worked to meet that August 3, 2009, deadline and did so with a filing that included approximately 700 separate measures and programs.

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3. The Electric Utilities have continued to work diligently on developing the values and protocols. However, given the exceptionally large number of separate measures and programs that were included in the August 3, 2009 filing, the current schedule contains insufficient time even within a single company to examine and propose values and protocols for each measure and program. The task is compounded in difficulty by the requirement that efforts be made to develop a “consensus” document, including input from other stakeholders. That requires the Electric Utilities to formulate their positions with respect to each measure and program and to discuss with each other and other stakeholders each value and protocol.

4. While attempts have been made to accelerate this process by also reviewing technical reference manuals that have been published in other states, the Electric Utilities do not believe that there is sufficient time before September 15, 2009, to complete this process and create a quality document that is the product of consensus.

5. The Electric Utilities’ request is also consistent with the revised deadline of October 15, 2009 that was established by the Commission’s Entry of July 14, 2009, for gas utilities to file their values and protocols.

6. This short delay should not adversely affect the timing of the filing of a framework Technical Reference Manual, which the current procedural schedule identifies only as an “expected” deadline of November 11, 2009. The Electric Utilities believe that that expectation can best be met if the short delay requested here is given so that the framework TRM can be developed using a consensus document of values and measures, rather than a hastily prepared document that does not reflect consensus.

7. Expedited consideration is requested here because the September 15, 2009, deadline is fast approaching. All other parties to this proceeding have been contacted with respect

to this Motion and its expedited consideration. No party has indicated that they will oppose the Motion or its consideration on an expedited basis.

For the foregoing reasons, the *Electric Utilities* request that the Commission grant this Motion on an expedited basis.

Respectfully submitted on behalf of each of the
aforementioned Electric Utilities

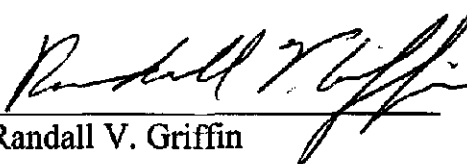


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Dated: September 2, 2009

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served either electronically or via first class mail, postage prepaid, this 2nd day of September, 2009 upon the individuals and companies listed as parties in Case No. 09-512-GE-UNC in the Commission's Notice of Service of July 31, 2009.


Randall V. Griffin