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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO - 1 PM 2: 22

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In the Matter of the Application of :
Columbus Southern Power Company and : Case No. 10-1261-EL-UNC
Ohio Power Company for Administration :
of the Significantly Excessive Earnings :
Test Under Section 4928.143(F), Revised :
Code, and Rule 4901:1-35-10, Ohio :
Administrative Code. :

**MOTION FOR EXTENSION
AND REQUEST FOR EXPEDITED RULING
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Pursuant to Rules 4901-1-12(C) and 4901-1-13(A) of the Ohio Administrative Code, the Staff of the Public Utilities Commission of Ohio ("Staff") respectfully moves for an extension of time to file its testimony. Staff requests that the current deadline of October 12, 2010 be extended to October 21, 2010. The reasons for this motion are set forth in the accompanying memorandum in support, which is incorporated herein by reference.

Additionally, Staff respectfully requests an expedited ruling on this motion. Columbus Southern Power Company and Ohio Power Company object to this request for an expedited ruling without the filing of memoranda. The Office of the Ohio Consumers' Counsel, Industrial Energy Users-Ohio, Ohio Partners for Affordable Energy, Ohio Energy Group, Appalachian Peace and Justice Network, Ohio Manufacturers' Association, and Ohio Hospital Association do not object.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Date Processed 10-1-2010

Respectfully submitted,

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Ohio Attorney General

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On behalf of the Staff of
The Public Utilities Commission of Ohio

MEMORANDUM IN SUPPORT

On September 1, 2010, Columbus Southern Power Company and Ohio Power Company ("Companies") filed a letter and supporting testimony to initiate the administration of the significantly excessive earnings test ("SEET") for 2009. Subsequently, on September 21, 2010, the attorney examiner issued an entry establishing a procedural schedule for this proceeding. Pursuant to this entry, Staff's and intervenors' testimony is due on October 12, 2010. Staff, however, has determined that additional time is needed to prepare its testimony and therefore requests an extension of the deadline.

The individuals assigned to this case on behalf of Staff are involved in a number of other SEET proceedings that are currently before the Commission on a similar time-frame as the Companies' case. Due to the significant time and effort involved in analyzing all of the various factors and related data that are associated with the SEET, Staff requests that the deadline of October 12, 2010 for the filing of Staff's testimony be extended to October 21, 2010. Rule 4901-1-13(A) of the Ohio Administrative Code provides for extensions where good cause is shown. Staff believes that good cause exists in these circumstances. This is a significant case involving the first administration of the SEET, and additional time is needed so that Staff may evaluate all of the relevant data and make an appropriate and well-informed recommendation to the Commission.

In light of the short timeframe remaining before Staff's testimony is due, Staff further requests an expedited ruling on this motion pursuant to Rule 4901-1-12(C) of the

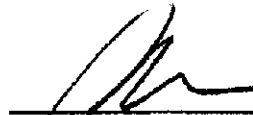
Ohio Administrative Code. Staff has contacted all of the parties to this proceeding to determine whether they object to the issuance of an expedited ruling without the filing of memoranda. The Companies object to Staff's request. All of the other parties to this proceeding (Office of the Ohio Consumers' Counsel, Industrial Energy Users-Ohio, Ohio Partners for Affordable Energy, Ohio Energy Group, Appalachian Peace and Justice Network, Ohio Manufacturers' Association, and Ohio Hospital Association) have no objection.

Therefore, Staff respectfully requests that its motion for an extension and request for an expedited ruling be granted.

Respectfully submitted,

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On behalf of the Staff of
The Public Utilities Commission of Ohio

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension and Request for Expedited Ruling**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, and sent by e-mail to the following parties of record, this 1st day of October, 2010.



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Assistant Attorney General

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