



BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Authority to Establish)
a Standard Service Offer Pursuant to)
§4928.143, Ohio Rev. Code, in the Form)
of an Electric Security Plan, Accounting)
Modifications and Tariffs for Generation)
Service.)

Case No. 11-3549-EL-SSO

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Authority to Amend)
its Certified Supplier Tariff PUCO No. 20.)

Case No. 11-3550-EL-ATA

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Authority to Amend)
its Corporate Separation Plan.)

Case No. 11-3551-EL-UNC

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**JOINT MOTION FOR THE EXTENSION OF TESTIMONY DEADLINES AND
REQUEST FOR EXPEDITED TREATMENT**

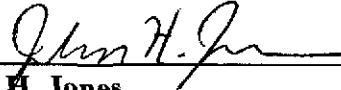
The Staff of the Public Utilities Commission of Ohio ("Staff"), Duke Energy Ohio, Inc. ("Duke Energy Ohio") and all of the intervenors, pursuant to Ohio Administrative Code 4901-1-13(A), respectfully request a one week extension of the testimony filing deadline for the intervenors and a one day extension of the testimony filing deadline for the Staff reflected in the October 5, 2011 Attorney Examiner Entry. Movants also request that the Commission grant movants' motion on an expedited basis pursuant to O.A.C. 4901-1-12(C). The reasons for this motion are set forth more fully in the attached memorandum.¹

¹ Staff has been given authority to sign on behalf of Duke Energy Ohio and all intervenors.

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Respectfully submitted,

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MEMORANDUM IN SUPPORT

On June 20, 2011, Duke Energy Ohio submitted an application for approval of a proposed electric security plan for its standard service offer of electric generation supply, in the above-captioned proceeding. By entry dated October 5, 2011, the Commission adopted a procedural schedule setting a date for the filing of testimony and an evidentiary hearing as follows²:

1. Testimony on behalf of intervenors is to be filed by October 19, 2011.
2. Discovery requests, except for notices of deposition, are to be served by October 7, 2011.
3. Testimony on behalf of Staff is to be filed by October 27, 2011.
4. The evidentiary hearing is to begin on November 3, 2011 at 10:00 a.m.

For the reasons set forth below, movants request a one-week extension of the testimony filing deadline for the intervenors and a one-day extension of the testimony filing deadline for the Staff which would amend the procedural schedule as follows:

1. Testimony on behalf of intervenors would be filed by October 26, 2011.
2. Testimony on behalf of Staff would be filed by October 28, 2011.
3. The evidentiary hearing would begin on November 3, 2011 at 10:00 a.m.

The parties are not seeking an extension of the hearing date.

All of the parties in this proceeding have been engaged in productive settlement negotiations for several weeks, and the parties believe they may be close to a stipulation. Accordingly, movants respectfully request an extension as described above in order to continue settlement discussions and efficiently present the potential settlement and supporting testimony. If

² The October 5, 2011 entry amended the original procedural schedule based upon a joint motion for extension filed by a number of parties on October 3, 2011.


for some reason no Stipulation and Recommendation is filed prior to the rescheduled hearing date, the evidentiary hearing will commence with the first witness on November 3, 2011.

O.A.C. 4901-1-12(C) allows a party to request that the Commission consider a motion on an expedited basis. Accordingly, Staff and the above named parties respectfully request an expedited ruling that the testimony filing deadlines be extended as requested above. The undersigned counsel for Staff has been given the authority to make and sign this motion on behalf of all the other parties to this proceeding.

Respectfully Submitted,

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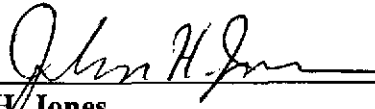
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joint Motion for Extension of Testimony Deadlines and Request for Expedited Ruling has been served upon the below-named counsel via electronic mail, this 14th day of October, 2011.



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