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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy)
Ohio for Authority to Establish a Standard Service)
Offer Pursuant to Section 4928.143, Revised Code,)
in the Form of an Electric Security Plan,) Case No. 11-3549-EL-SSO
Accounting Modifications and Tariffs for)
Generation Service.)

In the Matter of the Application of Duke Energy)
Ohio for Authority to Amend its Certified Supplier)
Tariff, P.U.C.O. No. 20.) Case No. 11-3550-EL-ATA

In the Matter of the Application of Duke Energy)
Ohio for Authority to Amend its Corporate)
Separation Plan.) Case No. 11-3551-EL-UNC

JOINT MOTION FOR EXTENSION OF TIME

On June 20, 2011, Duke Energy Ohio, Inc. ("DEO") filed an Application seeking approval of a standard service offer in the form of an approximately 10 year electric security plan ("ESP"), several tariff and accounting changes, and a new corporate separation plan. Pursuant to Ohio Administrative Code Rule 4901-1-13 and other applicable law, FirstEnergy Solutions Corp. ("FES"), DEO, the City of Cincinnati, Ohio Manufacturers Association, Ohio Energy Group, Dominion Retail, Inc., Enernoc, Inc., Duke Energy Retail Sales, LLC, People Working Cooperatively, Inc., Vectren Retail, LLC d/b/a/ Vectren Source, Environmental Law & Policy Center, Natural Resources Defense Council, Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc., Industrial Energy Users-Ohio, Direct Energy Services, LLC, Direct Energy Business LLC, The Greater Cincinnati Health Council, Eagle Energy, LLC, Cincinnati Bell Inc., Ohio Environmental Council, Wal-Mart Stores East, LP

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and Sam's East, Inc., and Exelon Generation Company, LLC (collectively, "Joint Movants")¹ hereby jointly and respectfully request that the procedural schedule for these matters, specifically including the commencement of the hearing, be extended by one (1) week unless the Joint Movants sign a Stipulation and Recommendation on Monday, October 24, 2011. If a Stipulation and Recommendation is signed on Monday, October 24, 2011, the Joint Movants agree to proceed with the current procedural schedule. The Joint Movants request that the Commission grant this motion on an expedited basis pursuant to Ohio Administrative Code Rule 4901-1-12(C). The reasons for this motion are set forth in the attached Memorandum in Support.

¹ The Office of the Ohio Consumers' Counsel does not oppose this Motion. No party has indicated that it opposes this Motion.

Dated: October 21, 2011

Respectfully submitted,

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MEMORANDUM IN SUPPORT

Pursuant to Ohio Administrative Code Rule 4901-1-13, the Commission may grant continuances and extensions of time for good cause shown. For the reasons set forth below, there is good cause for moving the procedural schedule for these matters back one (1) week.

The October 17, 2011, Entry in these matters established the following procedural schedule:

- Intervenor testimony due October 26, 2011
- Staff testimony due October 28, 2011
- Evidentiary hearing begins November 3, 2011

The Joint Movants seek an extension of time because they are engaged in ongoing settlement negotiations with DEO. Many of the Joint Movants are also parties to another proceeding currently pending before the Commission to address the validity of a Stipulation and Recommendation (“Stipulation”) entered in Columbus Southern Power Company and

Ohio Power Company's ("AEP Ohio") ESP case and related matters. The hearing for that matter is ongoing. As a result, many of the Joint Movants will be severely prejudiced in their ability to draft testimony, conduct depositions, and otherwise prepare for the hearing for these matters under the pending procedural schedule. Accordingly, the Joint Movants propose the following procedural schedule:

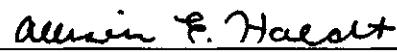
- Intervenor testimony due November 2, 2011
- Staff testimony due November 4, 2011
- Evidentiary hearing begins November 10, 2011

If a Stipulation and Recommendation is signed by the Joint Movants on Monday, October 24, 2011, the Joint Movants agree to proceed based upon the current procedural schedule.

Ohio Administrative Code Rule 4901-1-12(C) allows a party to request that the Commission consider a motion on an expedited basis. Accordingly, the Joint Movants respectfully request that the Commission grant this motion on an expedited basis.

Dated: October 21, 2011

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Extension of Time was sent to the following by e-mail this 21st day of October, 2011.

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