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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

*In the Matter of the Application of Ohio
American Water Company to Increase Its
Rates for Water and Sewer Service.*

: Case No. 11-4161-WS-AIR
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MOTION FOR AN EXTENSION OF TIME
AND
MEMORANDUM IN SUPPORT
OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

Pursuant to O.A.C. 4901-1-13(A), the Staff of the Public Utilities Commission of Ohio (Staff) respectfully requests that Staff's deadline for filing direct expert testimony be extended until **Tuesday March 20, 2012**.

The current procedural schedule requires all parties to file their direct expert testimony on March 1, 2012. In addition, all objections to the Staff Report are due on March 1, 2012. Staff will not be able to address any of the issues raised in the parties' objections in Staff's direct testimony if Staff is required to file its testimony on March 1, 2012. Because the objections to Staff's Report will frame the issues for an actual hearing in this matter, Staff believes that it is important that it have an opportunity to review and fully address any of the parties' objections prior to filing its direct testimony. Therefore, Staff suggests that it be allowed to file its direct testimony after the parties

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file their objections to the Staff Report, and after Staff has had an opportunity to file any potential motions to strike to these objections.

Staff respectfully request the Commission set **Tuesday March 20, 2012** as the new deadline for the filing of Staff's testimony. This deadline would provide all parties almost a full week to review Staff's testimony prior to the March 26, 2012 hearing date and, thus, no party would be prejudiced by this extension. In addition, this request would not delay the adjudicatory hearing or any potential settlement discussions. Finally, Staff has not requested any other extension of time in this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Tom Lindgren", written over a horizontal line.

Thomas G. Lindgren

Devin D. Parram

Assistant Attorney General

Public Utilities Section

180 East Broad Street

Columbus, OH 43215-3793

(614) 466-4396

FAX: (614) 644-8764

E-mail: thomas.lindgren@puc.state.oh.us

devin.parram@puc.state.oh.us

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension of Time** was served by regular U.S. mail upon the following parties of record, this 28th day of February, 2012.



Devin D. Parram
Assistant Attorney General

PARTIES OF RECORD:

City of Marion, Ohio

Mark D. Russell
Law Director - City of Marion, Ohio
233 West Center Street
Marion, Ohio 43302
law@marionohio.org

Office of Ohio's Consumer's Council

Melissa R. Yost
Kyle L. Kern
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
yost@occ.state.oh.us
kern@occ.state.oh.us

Perry Township, Franklin County, Ohio

Peter N. Griggs
Loveland & Brosius, LLC
50 West Broad St., Suite 3300
Columbus, Ohio 43215
pgriggs@lblaw.net