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Respectfully submitted,

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MEMORANDUM IN SUPPORT

With the recent change in the procedural schedule, Staff asks that it be permitted to submit the testimony of Peter Baker and Robert Fortney to address aspects of the electric security plan proposed by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company. Time did not previously permit the development of this testimony. With the change in the procedural schedule, the submission of additional testimony at this point in time will not prejudice any party and will provide the Commission with a more complete record for its consideration. This testimony will be available for filing on May 7th, 2012.

Respectfully submitted,

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion to Accept Testimony** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or hand-delivered, upon the following Parties of Record, this 3rd day of May, 2012.



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