

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

GWENDOLYN TANDY,	)	
	)	
Complainant,	)	
	)	Case No. 12-2102-EL-CSS
v.	)	
	)	
THE CLEVELAND ELECTRIC	)	
ILLUMINATING COMPANY,	)	
	)	
Respondent.	)	

**MOTION TO CONTINUE HEARING**

In accordance with Rules 4901-1-13 and 4901-1-12(A), Ohio Administrative Code, The Cleveland Electric Illuminating Company (“CEI”) respectfully requests an Entry continuing the hearing scheduled in this case on Tuesday, December 4, 2012. Good cause exists for granting this motion, which is explained in the accompanying memorandum in support.

Dated: November 19, 2012

Respectfully submitted,

/s/ Gregory L. Williams

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ATTORNEYS FOR  
THE CLEVELAND ELECTRIC  
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## MEMORANDUM IN SUPPORT

By Entry dated November 1, 2012, a hearing was scheduled in this case for Tuesday, December 4, 2012. One week later, however, the Complainant amended her original complaint with 56 pages of additional information that raise new issues and additional complaints. CEI does not concede that these new materials set forth reasonable grounds for complaint, but in the interest of judicial economy and in order to address all complaints made in this docket at the same proceeding, CEI respectfully requests an Entry granting a continuance of the December 4, 2012 hearing. Otherwise, CEI, its witness—who resides in Pennsylvania—and the Commission will bear the burden of devoting at least twice the time, energy, and resources to responding to additional complaints that have all been raised by the same complainant. For these reasons, good cause exists for granting this motion, and CEI is not requesting this continuance for purposes of delay.

CEI's undersigned counsel is also defending The East Ohio Gas Ohio Company d/b/a Dominion East Ohio ("DEO") against a complaint raised by the same complainant and for which a hearing is also scheduled for December 4, 2012. *See* Case No. 12-2103-GA-CSS. To avoid requiring Ms. Tandy to travel twice to Columbus for separate hearings, DEO would consent to the rescheduling of its hearing to the same date as CEI's, if the continuance is granted.

Therefore, CEI respectfully requests that the Commission issue an Entry continuing the hearing scheduled for Tuesday, December 4, 2012, to a date to be determined. In light of the upcoming holidays and to provide sufficient time to investigate and, as appropriate, respond to the new complaints, CEI would respectfully request that the hearing be continued until January 2013 at the earliest.

Dated: November 19, 2012

Respectfully submitted,

/s/ Gregory L. Williams

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ELECTRIC ILLUMINATING COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Continue Hearing was served by U.S. mail to the following person on this 19<sup>th</sup> day of November 2012:

Gwendolyn Tandy  
1439 Sulzer Avenue  
Euclid, Ohio 44132

/s/ Gregory L. Williams  
One of the Attorneys for  
The Cleveland Electric Illuminating  
Company

**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 12-2102-EL-CSS**

Summary: Motion to Continue Hearing electronically filed by Mr. Gregory L. Williams on behalf of The Cleveland Electric Illuminating Co.