

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

LYNNE GWYNN,

Complainant,

v.

**THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,**

Respondent.

)
)
)
)
)
)
)
)
)
)

Case No. 13-666-EL-CSS

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING AND FOR
EXPEDITED REVIEW**

Pursuant to Rule 4901-1-13 of the Ohio Administrative Code, The Cleveland Electric Illuminating Company ("CEI") hereby respectfully requests that the Public Utilities Commission of Ohio ("Commission") grant this Motion for Extension of Time for CEI to file its responsive pleading, which is currently due April 3, 2013. CEI requires additional time to prepare its responsive pleading because additional time is needed to investigate Complainant's claims. Accordingly, as explained more fully in the attached Memorandum in Support, CEI respectfully requests an Entry granting CEI's Motion for Extension of Time and providing that CEI may file a responsive pleading on or before April 23 2013. CEI also respectfully requests that this Motion be granted on an expedited basis pursuant to Rule 4901-1-12(C) of the Ohio Administrative Code.

Dated: March 22, 2013

Respectfully Submitted,

/s/ Carrie M. Dunn

Carrie M. Dunn (0076952)
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
Telephone: (330) 761-2352
Facsimile: (330) 384-3875
E-mail: cdunn@firstenergycorp.com

ATTORNEY FOR RESPONDENT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|-------------------------------|---|-------------------------------|
| LYNNE GWYNN, |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | Case No. 13-666-EL-CSS |
| |) | |
| THE CLEVELAND ELECTRIC |) | |
| ILLUMINATING COMPANY, |) | |
| |) | |
| Respondent. |) | |

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 granting CEI an extension of time until April 23, 2013, to file a responsive pleading in this case.

CEI's responsive pleading is currently due April 3, 2013. Complainant's Complaint involves the alleged conduct of a third party contractor. CEI seeks an extension of time so that it can fully investigate Complainant's claims. This is the first request for an extension that CEI has made and CEI is not requesting this extension for purposes of delay. This extension also will not prejudice any party to this case. Accordingly, CEI asks that it be permitted to file a responsive pleading on or before April 23, 2013.

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

Dated: March 22, 2013

Respectfully Submitted,

/s Carrie M. Dunn

Carrie M. Dunn (0076952)
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
Telephone: (330) 761-2352
Facsimile: (330) 384-3875
E-mail: cdunn@firstenergycorp.com

ATTORNEYS FOR RESPONDENT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was delivered to the following persons by first class mail, postage prepaid, this 22nd day of March 2013.

Lynne Gwynn
4494 Silverdale Road
North Olmsted, Ohio 44070

/s/ Carrie M. Dunn
An Attorney For Respondent The Cleveland
Electric Illuminating Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/22/2013 2:10:05 PM

in

Case No(s). 13-0666-EL-CSS

Summary: Motion for Extension of Time to File Responsive Pleading and for Expedited Review

electronically filed by Ms. Carrie M Dunn on behalf of The Cleveland Electric Illuminating Company