

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MICHAEL GRENIER,)	
)	
Complainant,)	
)	
v.)	Case No. 15-0224-EL-CSS
)	
THE TOLEDO EDISON COMPANY,)	
)	
Respondent.)	
)	

**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 Toledo Edison Company ("Toledo Edison") hereby respectfully requests that the Public Utilities Commission of Ohio ("Commission") grant this Motion for Extension of Time for an extension of twenty (20) days to file its responsive pleading, which is currently due February 17, 2015. Toledo Edison requires additional time to prepare its responsive pleading so that it may discuss and potentially resolve this Complaint with the Complainant. Accordingly, as explained more fully in the attached Memorandum in Support, Toledo Edison respectfully requests an Entry granting Toledo Edison's Motion for Extension of Time and providing that Toledo Edison may file a responsive pleading on or before March 9, 2015. Toledo Edison 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: February 17, 2015

Respectfully Submitted,

/s/ Carrie M. Dunn

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ATTORNEY FOR RESPONDENT
THE TOLEDO EDISON COMPANY

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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 granting The Toledo Edison Company (“Toledo Edison”) an extension of time until March 9, 2015, to file a responsive pleading in this case.

Toledo Edison’s responsive pleading is currently due February 17, 2015. Toledo Edison requests an extension so that it may discuss and potentially resolve the Complaint with Complainant. This is the first request for an extension that Toledo Edison has made and Toledo Edison is not requesting this extension for purposes of delay. This extension also will not prejudice any party to this case. Accordingly, Toledo Edison asks that it be permitted to file a responsive pleading on or before March 9, 2015.

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, Toledo Edison respectfully requests that the Commission grant this Motion on an expedited basis.

Dated: February 17, 2015

Respectfully Submitted,

/s Carrie M. Dunn

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ATTORNEYS FOR THE TOLEDO EDISON
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 17th day of February 2015.

Michael Grenier
30 S. Dorcas Road #22
Toledo, Ohio 43615

/s/ Carrie M. Dunn
An Attorney For Respondent The Toledo
Edison Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/17/2015 10:29:45 AM

in

Case No(s). 15-0224-EL-CSS

Summary: Motion for Extension of Time and for Expedited Review electronically filed by Ms. Carrie M Dunn on behalf of The Toledo Edison Company