

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Ohio	)	
Development Services Agency for an Order	)	
Approving Adjustments to the Universal	)	Case No. 15-1046-EL-USF
Service Fund Riders of Jurisdictional Ohio	)	
Electric Distribution Utilities.	)	

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**OHIO DEVELOPMNT SERVICES AGENCY'S  
MOTION FOR EXTENSION OF TIME**

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Pursuant to Ohio Administrative Code Rules 4901-1-12(C) and (F), the Ohio Development Services Agency (“ODSA”) respectfully requests the Public Utilities Commission of Ohio (“Commission”) to grant this motion to extend the procedural schedule in this proceeding for a period of two weeks, pursuant to OAC Rule 4901-1-12(F). The extension would not adversely affect the substantial rights of any party to this proceeding. Alternatively, ODSA requests that the time for filing direct testimony and reply testimony in this proceeding be extended for a period of five days, pursuant to OAC Rule 4901-1-12(C). The reasons supporting ODSA’s motion appear in the accompanying Memorandum in Support.

Respectfully submitted,



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## **MEMORANDUM IN SUPPORT**

By Entry issued June 9, 2015, the attorney examiner set a procedural schedule in this proceeding. The schedule required, among other things, that objections to the Ohio Development Services Agency's ("ODSA") Notice of Intent ("NOI") filed May 29, 2015 be filed by July 6, 2015 and that responses to the objections be filed by July 13, 2015. The Ohio Power Company ("AEP Ohio") and Ohio Partners for Affordable Energy ("OPAE") each filed timely objections to the NOI; and ODSA, OPAE and the Industrial Energy Users – Ohio ("IEU") timely filed responses.

ODSA currently is attempting to resolve the objections with the parties to eliminate the need for hearing. However, ODSA requires additional time to consider the appropriateness of AEP Ohio's objection related to merging its rate zones, including its effect on ODSA's operations, if the objection were granted. Accordingly, ODSA requests that the procedural schedule be extended for a period of two weeks, pursuant to OAC Rule 4901-1-12(F). This rule permits the attorney examiner to grant such extension, without the filing of memoranda, if the parties' substantial rights are not adversely affected. ODSA submits that the parties' substantial rights will not be adversely affected considering that the extension affects only the NOI phase of this proceeding. If necessary, all parties will have a sufficient opportunity to file testimony under the revised schedule and litigate any issues that remain prior to the second phase of this proceeding, which commences with the filing of an application by October 31, 2015. Moreover, the universal service fund rider rates that will result from this proceeding will not be effective until January 1, 2016.

ODSA requests that the revised procedural schedule be as follows:

<b>TASK</b>	<b>ORIGINAL DUE DATE</b>	<b>REVISED DUE DATE</b>
File Direct Testimony	July 27, 2015	August 10, 2015
File Reply Testimony	August 4, 2015	August 18, 2015
Evidentiary Hearing	August 19, 2015	September 2, 2015
File Post-Hearing Briefs	August 26, 2015	September 9, 2015
File Reply Briefs	September 2, 2015	September 16, 2015

In the alternative, ODSA requests, pursuant to OAC Rule 4901-1-12(C), that the time for filing direct testimony, currently due July 27, 2015, be extended to August 3, 2015; and the time for filing reply testimony, currently due August 4, 2015, be extended to August 10, 2015. This rule also permits the attorney examiner to grant the extension without the filing of memoranda. Under this alternative proposal, the dates for the evidentiary hearing and briefing would remain as originally ordered.

WHEREFORE, for the reasons set forth above, ODSA respectfully requests that the Commission grant its motion for extension of time.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time was served upon the following parties of record by e-mail and/or regular U.S. mail, this 24<sup>th</sup> day of July 2015.

  
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Summary: Motion for Extension of Time electronically filed by Dane Stinson on behalf of Ohio Development Services Agency