

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company for Authority to Provide)
for a Standard Service Offer Pursuant to)
R.C. 4928.143 in the Form of an Electric)
Security Plan.)

Case No. 14-1297-EL-SSO

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE BRIEFS AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rules 4901-1-12, 4901-1-13 and 4901-1-14 of the Ohio Administrative Code ("OAC"), the Electric Power Supply Association and the PJM Power Providers Group ("the Joint Movants"), intervenors in this matter, respectfully move for a brief extension of time for all parties to file their initial briefs on February 16, 2016, instead of February 12, 2016, and a corresponding adjustment to the deadline of filing reply briefs on February 26, instead of February 22, 2016. The reasons supporting the requested extension are set forth in the accompanying memorandum in support. The following parties support the sought extension: Northeast Ohio Public Energy Council; Power for the Schools; Ohio Schools Council; the Ohio Manufacturers' Association Energy Group; Direct Energy Services LLC; Direct Energy Business Marketing LLC; Direct Energy Business LLC, Environmental Ohio Hospital Association; and the Environmental Law & Policy Center.¹

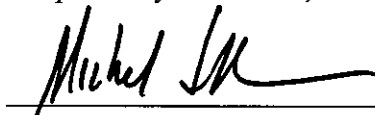
¹ Counsel for the Sierra Club was contacted, and communicated that although Sierra Club did not recently file briefs in Case Nos. 14-1693-EL-RDR et al., Sierra Club supports this brief, four-calendar-day extension due to significant scheduling conflicts in early February, and because it needs additional time for the numerous redactions required for a brief that thoroughly addresses the many issues in this case.

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The Joint Movants also request an expedited ruling pursuant to Rule 4901-1-12(C) of the OAC. The undersigned certifies that Ohio Edison Company, The Toledo Edison Company and The Cleveland Electric Illuminating Company object to the issuance of an expedited ruling in this matter.

WHEREFORE, it is respectfully requested that the Attorney Examiner on an expedited basis, and without waiting for replies, issue an Entry² extending the deadline for the filing of briefs by all parties in this case to February 16 and 26, 2016, instead of February 12 and 22, 2016.

Respectfully submitted,



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² The Attorney Examiner's January 29, 2016 Entry previously extended the date for reply briefs *sua sponte*.

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| Security Plan. |) | |

MEMORANDUM IN SUPPORT

The Joint Movants seek a mere four-day extension until February 16 (the day after Presidents' Day) and February 26 for the filing of briefs by all parties in this matter. This brief extension not only will permit the parties to better assist the Commission in resolving the many complex issues but will also give the Joint Movants and other parties sufficient time to prepare any necessary motions for protective orders and will maintain the current ten-day interval between the initial and reply briefs. The Commission, the Staff and all parties will benefit by granting this minimal extension.

As background, it should be noted that on January 29, 2016, the Attorney Examiner issued an Entry in this matter finding that the briefing schedule in this case should be amended and that the deadline to file reply briefs should be extended to February 22, 2016. The Attorney Examiner noted that the established deadline to file initial briefs would remain as previously scheduled on February 12, 2016.

The Electric Power Supply Association and the PJM Power Providers Group are intervenors in this case as well as Case Nos. 14-1693-EL-RDR, et al. The initial and reply briefs in Case No. 14-1693 were filed on February 1 and 8, 2016. The time commitments required to prepare and file briefs in Case No. 14-1693 have vastly diminished the time available for the Joint Movants and others to adequately prepare for the preparation of the briefs in Case No. 14-

1297. In addition, the briefs in this case will contain a great deal of confidential information. The Joint Movants must carefully redact from their briefs those references that FirstEnergy has deemed to be confidential. Additional time is needed for the redaction process, for preparation of the public and confidential versions of the briefs, and for the preparation of motions for protective orders.

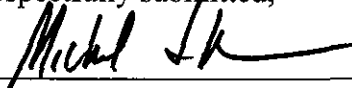
A four-day extension will not unduly delay this proceeding because the closing date for briefing in this case will only shift four days, from Monday, February 22 to Friday, February 26. The Commission will still have ample time to consider both the initial briefs and the reply briefs and to issue a final ruling prior to the expiration date of the Companies' current electric security plan (May 31, 2016). No one will be unduly prejudiced by the requested four-day extension.

Good cause exists for granting the brief extension to February 16 and 26, 2016 for the filing of briefs. If the Commission were to grant the requested extension, the interval between the filing of the initial brief and the reply brief would be maintained.

The Electric Power Supply Association and the PJM Power Providers Group are requesting an expedited ruling on this motion for an extension. The undersigned certifies that at least one of the parties has objected to the issuance of such an expedited ruling.

WHEREFORE, it is respectfully requested that the Attorney Examiner grant the motion for the brief extension of time on an expedited basis, without waiting for replies, and permit all parties to file briefs in this matter on February 16 and 26, 2016, instead of February 12 and 22, 2016.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of the public version of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 9th day of February, 2016.



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