

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	
Proposal to Enter into an Affiliate Power)	Case No. 14-1693-EL-RDR
Purchase Agreement for Inclusion in the)	
Power Purchase Agreement Rider.)	

In the Matter of the Application of)	
Ohio Power Company for Approval of)	Case No. 14-1694-EL-AAM
Certain Accounting Authority.)	

**OHIO POWER COMPANY MOTION FOR AN EXTENSION OF TIME
(EXPEDITED RULING REQUESTED)**

Pursuant to Rule 4901-1-13, O.A.C., Ohio Power Company ("AEP Ohio" or "Company") seeks a three-day extension of time to respond to the Applications for Rehearing filed on April 29, 2016, Dynegy, Inc., the PJM Power Providers Group and the Electric Power Supply Association, and the Retail Energy Supply Association (collectively, the "April 29 Applications for Rehearing"). As demonstrated in the attached Memorandum in Support, good cause exists for granting this extension. Unless this Motion is granted, the Company, and other interested parties, potentially will be required to file two separate memoranda contra, one on May 9, 2016, to respond to the April 29 Applications for Rehearing, and a second on May 12, 2016, to respond to applications for rehearing filed on May 2, 2016 – the date set by Rules 4901-1-35 and 4901-1-07, O.A.C. (the "May 2 Applications for Rehearing").

No party will be prejudiced by this extension. On the contrary, failing to grant this extension will prejudice the Company, and other Signatory Parties seeking to oppose the April 29 Applications for Rehearing, because it potentially will require the filing of two separate

memoranda contra (or unfairly shorten the timeframe for the Company's and other interested parties to respond to the May 2 Applications for Rehearing). Such an untoward result also would add to the administrative burden of the Commission by presenting additional memoranda contra for its review and consideration (as opposed to consolidated memoranda contra addressing all applications for rehearing). A single response would appear more efficient as the arguments between the two sets of comments may cover similar topics and not require repetitive documents for the Commission to review. Allowing for the filing of consolidated memoranda contra on May 12, 2016, thus promotes administrative efficiency and conserves judicial resources.

Pursuant to Rule 4901-1-12, O.A.C., the extremely short timeframe involved warrants an expedited ruling. The Company thus respectfully request that the Commission issue an expedited ruling granting the Company's motion and order all memoranda contra applications for rehearing in this proceeding be due on May 12, 2016.

Respectfully submitted,

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**OHIO POWER COMPANY'S MEMORANDUM
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
(EXPEDITED RULING REQUESTED)**

The Commission issued its Opinion and Order in this proceeding on March 31, 2016. Pursuant to Revised Code Section 4903.10 and Rule 4901-1-35(A), parties to a Commission proceeding have thirty days to file an application for rehearing upon the issuance of an order. Because the thirtieth day in the instant rehearing period fell on a Saturday (April 30, 2016), pursuant to Revised Code Section 1.14 and Rule 4901-1-07, parties to this proceeding have until Monday, May 2, 2016, to file their applications for rehearing. Pursuant to Rule 4901-1-35(C), memoranda contra are due ten days after the filing of an application for rehearing.

As it stands, memoranda contra the April 29 Applications for Rehearing are due on May 9, 2016. Memoranda contra the May 2 Applications for Rehearing, if any, however, will be due on May 12, 2016. Thus, the Company, and other interested parties, potentially will be required to file two separate memoranda contra, one on May 9, 2016, to respond to the April 29 Applications for Rehearing, and another on May 12, 2016, to respond to the May 2 Applications

for Rehearing. Alternatively, the Company, and other interested parties, will be forced to file any memoranda contra the May 2 Applications for Rehearing on May 9, 2016 – three days earlier than those memoranda contra otherwise would have been due. The rehearing requests already filed appear to consist of opposing parties reiterating most of their litigation positions, with 102 listed grounds for rehearing already filed and more expected to be filed today on May 2, 2016. The Company and other interested parties need these three additional days to respond adequately.

Notably, granting the Company's request and making all memoranda contra applications for rehearing filed in this matter due on May 12, 2016, will not in any way prejudice any other party to this proceeding. Presumably, the Commission will issue only one Entry on Rehearing that will address both the April 29 Applications for Rehearing and the May 2 Applications for Rehearing.

Moreover, not granting the Company's motion likely will add to the administrative burden of the Commission. The Company and other interested parties may well be forced to file two memoranda contra, thereby requiring the Commission to expend unnecessarily extra judicial resources to review and consider those additional memoranda contra. Making all memoranda contra due on May 12, 2016, will ensure that this does not occur. Further, from the perspective of administrative expediency, permitting the Company and other interested parties to file consolidated memoranda contra on May 12, 2016, makes sense because the April 29 and May 2 Applications for Rehearing likely will contain a great deal of overlapping arguments. A quick review of the 102 grounds for rehearing already filed show that 46 of the grounds are identical between two different filings. There is every reason to expect further overlap in the May 2nd filings.

Indeed, the Company's request for an extension of time is firmly aligned with Commission precedent. *See, e.g., In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Recover Costs Associated with the Ultimate Construction and Operation of an Integrated Gasification Combined Cycle Electric Generation Facility*, Case No. 05-376-EL-UNC, Entry at 1, (May 10, 2006) (granting two-day extension of time to file memorandum contra to applications for rehearing filed on different dates and holding that such an extension "would promote efficiency and not work to the detriment of the other parties"); *In the Matter of the Application of FirstEnergy Corp. on behalf of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Continue and Modify Certain Regulatory Accounting Practices and Procedures, to Transfer Jurisdictional Assets, to Establish Fuel Efficiency Procedures, to Freeze and Reduce Electric Rates and to File and Implement Tariffs Not for an Increase in Rates, All in Connection With and Subject to the Merger of Ohio Edison Company and Centerior Energy Corporation*, Case No. 96-1211-EL-UNC, 1997 Ohio PUC LEXIS 184 at *1 (Mar. 7, 1997) (granting three-day extension of time to file memoranda contra applications for rehearing filed on different dates because "administrative efficiency is furthered by allowing a uniform response to the applications for rehearing, especially given the commonality of issues raised in the various rehearing applications").

Pursuant to Rule 4901-1-12(C), an expedited ruling is necessary. Memoranda contra the April 29 Applications for Rehearing presently are due on May 9, 2016 – one week from the filing of this motion. Given the time-sensitive nature of the Company's request, an expedited ruling is warranted.

For the foregoing reasons, the Company respectfully requests that the Commission grant the Motion for Extension of Time on an expedited timeframe.

Respectfully submitted,

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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion for an Extension of Time and Expedited Treatment and Memorandum in Support* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 2nd day of May 2016, via electronic transmission.

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Summary: Motion -Ohio Power Company Motion for an Extension of Time (Expedited Ruling Requested) electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company