

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for an Increase in its Electric Distribution Rates	:	Case No. 15-1830-EL-AIR
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In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority	:	Case No. 15-1831-EL-AAM
	:	
In the Matter of the Application of Dayton Power and Light Company for Approval of Revised Tariffs	:	Case No. 15-1832-EL-ATA
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	:	Case No. 16-0395-EL-SSO
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	:	Case No. 16-0396-EL-ATA
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code § 4905.13	:	Case No. 16-0397-EL-AAM
	:	

**MOTION OF THE DAYTON POWER AND LIGHT COMPANY
FOR EXTENSION OF TIME TO FILE REPLY MEMORANDUM
REGARDING DP&L'S MOTION FOR CASE MANAGEMENT ORDER
TO ESTABLISH DEADLINES AND TO COORDINATE CASES**

EXPEDITED RULING REQUESTED

Pursuant to Ohio Admin. Code § 4901-1-13(A), The Dayton Power and Light Company ("DP&L") requests a 7-day extension of time to file its Reply on its motion for a case management order to establish deadlines and to coordinate cases. With the 7-day extension, DP&L's filing deadline would be Monday, May 16, 2016.

This motion is not opposed by Ohio Environmental Council, the Environmental Defense Fund, the Environmental Law & Policy Center, the Electric Power Supply Association, and PJM Power Providers Group. The Office of the Ohio Consumers Counsel did not consent to the extension. DP&L did not receive responses regarding its request for an extension from the remaining parties that filed oppositions to DP&L's motion to establish deadlines and to coordinate cases.

Respectfully submitted,

/s/ Charles J. Faruki

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**MEMORANDUM IN SUPPORT OF THE MOTION OF
THE DAYTON POWER AND LIGHT COMPANY
FOR EXTENSION OF TIME TO FILE REPLY MEMORANDUM
REGARDING DP&L'S MOTION FOR CASE MANAGEMENT ORDER
TO ESTABLISH DEADLINES AND TO COORDINATE CASES**

The Commission should grant DP&L a short 7-day extension of time, until May 16, 2106, to respond to the oppositions that were filed to DP&L's motion to implement the SSR-E, for two reasons. First, there have been a series of recent decisions by the Supreme Court of Ohio, the Supreme Court of the United States and the Federal Energy Regulatory Commission. DP&L needs time to analyze whether and how those decisions affect the ESP case and the appropriate schedule. Second, DP&L has been occupied this week preparing for and attending the Technical Conference.

This motion is not opposed by Ohio Environmental Council, the Environmental Defense Fund, the Environmental Law & Policy Center, the Electric Power Supply Association, and PJM Power Providers Group. The Office of the Ohio Consumers Counsel did not consent to the extension. DP&L did not receive responses regarding its request for an extension for the remaining parties that filed oppositions to DP&L's motion to establish deadlines and to coordinate cases.

Respectfully submitted,

/s/Charles J. Faruki

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion of The Dayton Power and Light Company for Extension of Time to File Reply Memorandum Regarding DP&L's Motion for Case Management Order to Establish Deadlines and to Coordinate Cases **EXPEDITED RULING REQUESTED** has been served via electronic mail upon the following counsel of record, this 6th day of May, 2016:

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Summary: Motion of The Dayton Power and Light Company for Extension of Time to File Reply Memorandum Regarding DP&L's Motion for Case Management Order to Establish Deadlines and to Coordinate Cases Expedited Ruling Requested electronically filed by Mr. Charles J. Faruki on behalf of The Dayton Power and Light Company