BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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)	Case No. 13-1939-EL-RDR
)	
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JOINT MOTION FOR A BRIEF CONTINUANCE OF THE SCHEDULED EVIDENTIARY HEARING

Pursuant to Rules 4901-1-12 and 4901-1-13, Ohio Administrative Code (OAC), the undersigned Signatory Parties jointly request a continuance of the scheduled evidentiary hearing from July 19, 2016 to July 27, 2016 or as soon as possible thereafter. The grounds for this joint motion are set forth in the accompanying memorandum in support.

Respectfully submitted,

/s/ Steven T. Nourse
Steven T. Nourse
On behalf of Ohio Power Company

/s/ Werner L. Margard, III /by STN per authority
Werner L. Margard, III
On behalf of the Staff of the Public Utilities
Commission of Ohio

/s/ Mark A. Whitt /by STN per authority
Mark A. Whitt
On behalf of Direct Energy

/s/ Matthew S. White /by STN per authority
Matthew S. White
On behalf of Interstate Gas Supply, Inc.

/s/ Matthew W. Warnock /by STN per authority
Matthew W. Warnock
On behalf of the Ohio Hospital Association

/s/ Scott J. Casto /by STN per authority
Scott J. Casto
On behalf of FirstEnergy Solutions Corp. 1

/s/ Trent A. Dougherty /by STN per authority
Trent A. Dougherty
On behalf of the Ohio Environmental Council

/s/ John J. Finnigan /by STN per authority
John J. Finnigan
On behalf of the Environmental Defense Fund

¹ FirstEnergy Solutions Corp. is a non-opposing party and is not a Signatory Party for purposes of the Stipulation or the Joint Motion.

MEMORANDUM IN SUPPORT

On June 14, 2016, the Attorney Examiner issued a procedural schedule for consideration of the April 7, 2016 Stipulation and Recommendation. The Stipulating Parties commend the Commission for establishing an expedited procedural schedule and are eager to proceed with the hearing. The primary technical expert witness supporting the Stipulation, however, has a hard scheduling conflict for the scheduled hearing date of July 19, 2016. Accordingly, the Signatory Parties jointly request that the evidentiary hearing be continued until July 27, 2016 or as soon as possible thereafter.

Respectfully submitted,

/s/ Steven T. Nourse
Steven T. Nourse
On behalf of Ohio Power Company

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On behalf of the Staff of the Public Utilities
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On behalf of Direct Energy

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On behalf of Interstate Gas Supply, Inc.

/s/ Matthew W. Warnock /by STN per authority
Matthew W. Warnock
On behalf of the Ohio Hospital Association

/s/ Scott J. Casto /by STN per authority
Scott J. Casto
On behalf of FirstEnergy Solutions Corp.²

/s/ Trent A. Dougherty /by STN per authority
Trent A. Dougherty
On behalf of the Ohio Environmental Council

/s/ John J. Finnigan /by STN per authority
John J. Finnigan
On behalf of the Environmental Defense Fund

² FirstEnergy Solutions Corp. is a non-opposing party and is not a Signatory Party for purposes of the Stipulation or the Joint Motion.

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 Continuance was sent by, or on behalf of, the undersigned counsel to the following parties of record this 17th day of June, 2016, via electronic transmission.

/s/ Steven T. Nourse
Steven T. Nourse

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Summary: Motion - Joint Motion for a Brief Continuance of the Scheduled Evidentiary Hearing electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company