

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Initiate)	
Phase 2 of its gridSMART Project)	Case No. 13-1939-EL-RDR
and to Establish the gridSMART)	
Phase 2 Rider)	

JOINT REPLY MEMORANDUM IN SUPPORT OF MOTION

On June 14, 2016, the Attorney Examiner issued a procedural schedule for consideration of the April 7, 2016 Stipulation and Recommendation. Through a motion, the Signatory Parties jointly requested that the evidentiary hearing be continued until July 27, 2016 or as soon as possible thereafter. OCC's memorandum Contra proposes that the hearing commence on August 1, due to other litigation deadlines. Joint Movants understand that the requested hearing date of July 27 may not be available due to other existing hearing schedules that tie up the hearing room and Attorney Examiner and do not oppose the August 1 alternative. But OCC's additional request to modify the other procedural deadlines is unsupported and unnecessary. OCC simply states that no prejudice would be caused but gives no reason to support delaying the testimony and discovery cutoff deadlines. Joint Movants did not request that those deadlines be adjusted and submit that it is unnecessary to do so. If the Commission does, however, adjust the procedural deadlines in conjunction with moving the hearing date to August 1, then it should establish a separate discovery cutoff for parties supporting the Stipulation to conduct discovery regarding the testimony that is filed in opposition to the Stipulation (which deadline would have to occur after the deadline for filing opposing testimony); currently, the general discovery cutoff occurs prior to the opposing testimony even being filed.

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.

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 Reply Memorandum was sent by, or on behalf of, the undersigned counsel to the following parties of record this 20th day of June, 2016, via electronic transmission.

/s/ Steven T. Nourse
Steven T. Nourse

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6/20/2016 1:59:37 PM

in

Case No(s). 13-1939-EL-RDR

Summary: Reply -Joint Reply Memorandum in Support of Motion electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company