

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the)	
Ohio Development Services Agency)	
for an Order Approving Adjustments)	Case No.16-1223-EL-USF
to the Universal Service Fund Rider)	
of Jurisdictional Ohio Electric)	
Distribution Utilities.)	

**JOINT MOTION TO EXTEND THE DEADLINE FOR TESTIMONY AND
REPLY TESTIMONY AND REQUEST FOR EXPEDITED RELIEF**

The Signatory Parties to this Motion, The Dayton Power and Light Company, Duke Energy Ohio, Inc., the FirstEnergy Utilities¹, Ohio Power Company, Industrial Energy Users-Ohio, The Kroger Company, and Ohio Partners for Affordable Energy (“Joint Movants”) respectfully move the Public Utilities Commission of Ohio (“PUCO” or “the Commission”) to extend the deadline for filing Direct Testimony until July 29, 2016, and Reply Testimony until August 5, 2016. Joint Movants further request an expedited ruling on said Motion. The reasons for granting this Motion are more fully explained in the attached Memorandum in Support.

Respectfully submitted,

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¹ Collectively comprised of The Cleveland Electric Illuminating Company, Ohio Edison Company, and Toledo Edison Company.

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MEMORANDUM IN SUPPORT

On May 31, 2016, the Ohio Development Services Agency filed its Notice of Intent to File an Application for Adjustments to the Universal Service Fund Riders. On June 2, 2016, the Attorney Examiner issued a procedural schedule whereby objections or comments were to be filed by June 30, 2016, and responses were to be filed by July 8, 2016. The procedural schedule further provided for Direct Testimony to be filed on by July 22, 2016, Reply Testimony by August 1, 2016, with an evidentiary hearing to begin on August 9, 2016.

The Joint movants request a minimal adjustment to the procedural schedule extending the deadline for Direct Testimony from July 22, 2016 to July 29, 2016, and for Reply Testimony from August 1, 2016 to August 5, 2016. The Joint Movants request no extension to the evidentiary hearing or briefing schedule. Joint Movants request this extension to have ample time to consider settlement proposals that have been circulated by multiple parties in this case. This extension will help parties conserve costs associated with the USF litigation and will promote judicial efficiency by potentially limiting the amount of testimony that will be submitted in this case. The PUCO Staff, Ohio Development Services Agency, and the Office of the Ohio Consumers' Counsel have indicated that they do not oppose the Joint Motion and do not object to the request for expedited treatment. Therefore, this Joint Motion is ripe for immediate ruling pursuant to O.A.C. 4901-1-12(c).

Ohio Adm. Code 4901-1-12(C) allows a party to request that the Commission consider a motion on an expedited basis. Accordingly, the Parties respectfully request an expedited ruling that the procedural schedule be extended as previously described.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was delivered electronically on this 22nd day of July, 2016, to the following parties.

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Summary: Motion JOINT MOTION TO EXTEND THE DEADLINE FOR TESTIMONY AND
REPLY TESTIMONY AND REQUEST FOR EXPEDITED RELIEF
electronically filed by Mr. Alan M. O'Meara on behalf of The Dayton Power and Light
Company