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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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PUCO

In the Matter of the Application of Ohio :  
Edison Company, The Cleveland Electric : Case No. 16-0743-EL-POR  
Illuminating Company, and The Toledo :  
Edison Company for Approval of their :  
Energy Efficiency and Peak Demand :  
Reduction Program Portfolio Plans for :  
2017 through 2019. :

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**STAFF'S MOTION TO CONTINUE INDEFINITELY PROCEDURAL  
SCHEDULE AND REQUEST FOR EXPEDITED TREATMENT**

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Staff of the Public Utilities Commission of Ohio (Staff) moves the Public Utilities Commission of Ohio (Commission) to continue indefinitely the procedural schedule in this case. The reasons for this motion are set forth more fully in the attached memorandum.

Respectfully submitted,

**Michael DeWine**  
Ohio Attorney General

  
**Natalia Messenger**  
**John H. Jones**

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**On behalf of the Staff of  
The Public Utilities Commission of Ohio**

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## MEMORANDUM IN SUPPORT

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On April 15, 2016, The Toledo Edison Company, The Cleveland Electric Illuminating Company and Ohio Edison Company (collectively “FirstEnergy” or “Companies”), filed their application for approval of their energy efficiency and peak demand reduction program portfolio plans for 2017 through 2019. On June 28, 2016, the Attorney Examiner issued an Entry setting an amended procedural schedule that included an evidentiary hearing on October 11, 2016. Parties have recently noticed and scheduled witness depositions to begin on September 30, 2016, and more witness depositions are scheduled for next week.

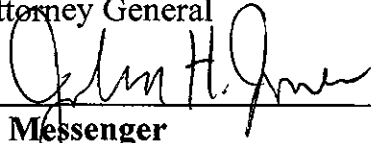
At this time, Staff moves to continue indefinitely the current procedural schedule to give the Staff more time to discuss FirstEnergy’s portfolio plans with the parties and explore whether settlement of all the issues is possible.

Ohio Adm. Code 4901-1-12(C) allows a party to request that the Commission consider a motion on an expedited basis. Accordingly, Staff respectfully requests an expedited ruling that the procedural schedule be continued indefinitely as requested in this motion. Counsel for Staff is unable to certify that no party objects to the issuance of an expedited ruling.

WHEREFORE, for the reasons stated herein, Staff respectfully requests that the Commission grant its motion and continue indefinitely the procedural schedule.

Respectfully submitted,

**Michael DeWine**  
Ohio Attorney General

A handwritten signature in black ink, appearing to read "John H. Jones", is written over a horizontal line.

**Natalia Messenger**

**John H. Jones**

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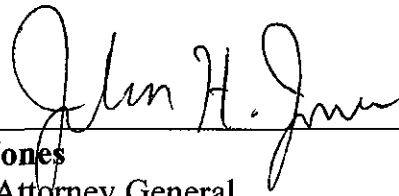
**On behalf of the Staff of  
The Public Utilities Commission of Ohio**

## **PROOF OF SERVICE**

I hereby certify that a true copy of the foregoing **Motion to Continue**

### **Indefinitely Procedural Schedule and Request for Expedited Treatment**

submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served via electronic mail upon the following Parties of Record, this 29th day of September, 2016.



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Assistant Attorney General

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