## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio	)	
Power Company for Authority to Establish a	)	
Standard Service Offer Pursuant to R.C.	)	Case No. 16-1852-EL-SSO
4928.143, in the Form of an Electric	)	
Security Plan.	)	
In the Matter of the Application of Ohio	)	
Power Company for Approval of Certain	)	Case No. 16-1853-EL-AAM
Accounting Authority.	)	

### OHIO POWER COMPANY'S MOTION FOR CONTINUANCE AND REQUEST FOR EXPEDITED RULING

Pursuant to Rules 4901-1-12 and 4901-1-32, Ohio Administrative Code, Ohio Power Company ("Ohio Power" or the "Company") respectfully moves that the Commission continue the deadline for refiling its Electric Security Plan to November 23, 2016. The Company requests that the continuance be considered on an expedited basis pursuant to O.A.C. 4901-1-12(C). A memorandum in support of the items in this motion is attached.

Respectfully submitted,

\_/s/ Steven T. Nourse

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**Counsel for Ohio Power Company** 

# OHIO POWER COMPANY'S MEMORANDUM IN SUPPORT OF THE MOTION FOR CONTINUANCE

On September 7, 2016, the Attorney Examiner issued an entry directing Ohio Power Company ("Ohio Power" or the "Company") to refile its Electric Security Plan (ESP) in this new docket. Given that directive and the passage of time since the original filing was made, AEP Ohio began the process of thoroughly reviewing and updating its proposed modifications to, and extension of, the existing ESP. In order to conduct that exercise and attempt to avoid further modifications after refiling the Application, the Company previously requested additional time until October 28, 2016, which was granted through a September 19, 2016 Entry. The Company continues to work on the filing and requests an additional extension to November 23 in order to complete it. Given the impending deadline, the Company requests an expedited ruling.

Respectfully submitted,

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#### **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 *Ohio Power Company's Motion for Continuance* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 20<sup>th</sup> day of October 2016, via electronic transmission.

/s/ Steven T. Nourse Steven T. Nourse

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Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

Summary: Motion -Ohio Power Company's Motion for Continuance and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company