

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

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

**UNOPPOSED JOINT MOTION TO CONTINUE
PROCEDURAL SCHEDULE AND VACATE HEARING DATE**

Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”), move the Public Utilities Commission of Ohio (“Commission”) to continue the procedural schedule in this case and vacate the hearing currently set for November 21, 22, and 23, 2016. The Companies further request a telephone conference with the Attorney Examiner, at his earliest convenience, so that the parties may discuss a new procedural schedule and hearing date. Commission Staff and all intervenors except the Office of Ohio Consumers’ Counsel (“OCC”) and Industrial Energy Users-Ohio (“IEU”) support and join this Motion.¹ OCC and IEU do not oppose this Motion.

The reasons for this Motion are set forth in the attached memorandum.

¹ The intervenors that support and join this Motion are The Ohio Manufacturer’s Association, Ohio Environmental Defense Counsel, Natural Resources Defense Council, Environmental Defense Fund, EnerNOC, Ohio Partners for Affordable Energy, IGS Energy, The Kroger Co., Environmental Law & Policy Center, The Ohio Hospital Association, and Energy Management Solutions, Inc.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

On October 26, 2016, the Attorney Examiner issued an Entry setting an amended procedural schedule that included an evidentiary hearing on November 21, 22, and 23, 2016. Last week, on November 10 and 11, 2016, the Companies held in-person meetings and/or telephone conferences with almost all intervenors and Commission Staff to continue settlement discussions. While those settlement discussions are ongoing, the parties have made significant progress toward reaching a resolution in this case and recently postponed all depositions in an attempt to facilitate those further settlement discussions.

In light of the ongoing settlement efforts, the Companies, along with the intervenors supporting and joining this Motion, request that the Commission continue the procedural schedule and vacate the hearing dates in this case. A continuance will afford the parties the necessary time to complete the settlement process and potentially reach a resolution that will eliminate the need for further litigation. The moving parties further request a telephone conference with the Attorney Examiner, at his earliest convenience, so that the parties may discuss a new procedural schedule and hearing date.

For the foregoing reasons, the Commission should grant the Motion. The intervenors who have not joined this motion, OCC and IEU, do not oppose the Motion.

Dated: November 15, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Unopposed Joint Motion to Continue Procedural Schedule and Vacate Hearing Date* will be served on this 15th day of November, 2016 by the Commission's e-filing system to the parties who have electronically subscribed to this case and via electronic mail upon the following counsel of record:

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Summary: Motion Unopposed Joint Motion for Continuance electronically filed by Michael R. Gladman on behalf of The Ohio Edison Company and The Toledo Edison Company and The Cleveland Electric Illuminating Company