

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for Approval of Its Energy	)	Case No. 16-0574-EL-POR
Efficiency/Peak Demand Reduction Portfolio	)	
Plan	)	

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**JOINT MOTION TO EXTEND PROCEDURAL SCHEDULE  
AND  
REQUEST FOR EXPEDITED TREATMENT  
SUBMITTED ON BEHALF OF  
THE STAFF OF THE PUBLIC UTILITIES COMMISSION  
AND OHIO POWER COMPANY**

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The Staff of the Public Utilities Commission of Ohio (“Staff”) and Ohio Power Company (“AEP Ohio”) respectfully move the Public Utilities Commission of Ohio (“Commission”) for an extension of the procedural schedule in the above-captioned proceeding to allow the parties additional time to engage in settlement discussions. Specifically, Staff and AEP Ohio request that the deadlines be extended as follows:

	Current Schedule	Requested Schedule
Intervenor Testimony Due	November 29, 2016	December 9, 2016
Staff Testimony Due	December 1, 2016	December 12, 2016
Hearing	December 6-7, 2016	December 16, 2016

Staff and AEP Ohio request expedited treatment of this motion under Ohio Adm. Code 4901-1-12(C). The reasons for this motion and request for expedited treatment are set forth more fully in the attached memorandum.

Respectfully submitted,

/s/ Natalia V. Messenger [by email authority]

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## MEMORANDUM IN SUPPORT

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On October 5 and 18, 2016, the Attorney Examiner assigned to this matter held discussions with all parties concerning the procedural schedule. On October 26, 2016, the Attorney Examiner issued an Entry setting a procedural schedule. On November 7, 2016, Staff and AEP Ohio filed a joint motion to extend the procedural schedule to allow the parties additional time to engage in settlement discussions. On November 8, 2016, the Attorney Examiner issued an Entry granting the motion to extend and establishing the current procedural schedule.

Since that time, Staff, AEP Ohio, and all parties have continued to engage in settlement negotiations. Although settlement negotiations have been productive, the parties will be unable to complete settlement discussions under the current procedural schedule. Accordingly, Staff and AEP Ohio respectfully request that the schedule be extended for ten days, with specific dates as set forth above in this Motion. It is the intention of the parties that this extension will allow the parties sufficient time to complete settlement discussions and there will be no additional adjustments to the schedule if a settlement is not forthcoming; if there is a settlement of some or all of the parties, the parties expect to request that the schedule be recalibrated for the Commission's consideration of the settlement.

The parties request expedited treatment of this Motion under Ohio Adm. Code 4901-1-12(C) because the current deadlines for intervenor and Staff testimony – November 29, 2016 and December 1, 2016, respectfully – are rapidly approaching. It is unnecessary for intervening parties and Staff to expend resources in developing testimony when settlement may still be

possible. Further, extending the deadline for intervenor and Staff testimony will allow those parties to focus on settlement rather than developing testimony.

In an all-party settlement meeting on November 22, 2016, the parties agreed to the dates proposed in this Motion, and that this Motion would be filed by AEP Ohio and Staff. This Motion was circulated to all parties prior to filing, and by the time of filing, AEP Ohio had received no objection to the Motion.

For the foregoing reasons, Staff and AEP Ohio respectfully request that the Commission extend the procedural schedule as requested in this Motion.

Respectfully submitted,

/s/ Natalia V. Messenger [by email authority]

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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 Joint Motion to Extend Procedural Schedule and Request for Expedited Treatment was sent by, or on behalf of, the undersigned counsel to the following parties of record this 23th day of November, 2016, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

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**Case No(s). 16-0574-EL-POR**

Summary: Motion - Joint Motion to Extend Procedural Schedule and Request for Expedited Treatment Submitted on Behalf of the Staff of the Public Utilities Commission and Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company