

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The	:	Case No. 16-395-EL-SSO
Dayton Power and Light Company for	:	
Approval of its Electric Security Plan.	:	

In the Matter of the Application of The	:	Case No. 16-396-EL-ATA
Dayton Power and Light Company for	:	
Approval of Revised Tariffs.	:	

In the Matter of the Application of The	:	
Dayton Power and Light Company for	:	Case No. 16-397-EL-AAM
Approval of Certain Accounting Authority	:	
Pursuant to Ohio Rev. Code § 4905.13.	:	

MOTION FOR CONTINUANCE
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

Comes now the Staff of the Public Utilities Commission of Ohio and respectfully moves that the Commission continue the hearing in the above-referred dockets pursuant to Section 4901-1-13, Ohio Administrative Code. The hearing is currently scheduled to occur on December 5, 2016 and Staff would ask that the hearing be continued until January 10, 2017, for the reasons set forth in the accompanying memorandum.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Thomas W. McNamee _____

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215-3414
614.466.4397 (telephone)
614.644.8764 (fax)
thomas.mcnamee@ohioattorneygeneral.gov

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

MEMORANDUM IN SUPPORT

These cases involve significant complexity involving as they do a potential restructuring of the applicant's business, a potential major business initiative, the ramifications of a Supreme Court decision and multiple other matters. Settlement discussions have been initiated and time is needed to fully explore the possibilities of resolving these cases in whole or in part. The immediacy of the hearing in this case would make these discussions impossible. All parties, and the Commission itself, would benefit from allowing additional time to clarify, and perhaps resolve, some or all of these many complicated matters. To this end, the Staff would recommend that the Commission continue the currently scheduled hearing for a period sufficient to allow settlement to be explored.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Thomas W. McNamee

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215-3414
614.466.4397 (telephone)
614.644.8764 (fax)
thomas.mcnamee@ohioattorneygeneral.gov

**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 for Continuance** 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 23rd day of November, 2016.

/s/ Thomas W. McNamee

Thomas W. McNamee

Assistant Attorney General

Parties of Record:

michael.schuler@aes.com

cfaruki@ficlaw.com

djieland@ficlaw.com

jsharkey@fisclaw.com

mfleisher@elpc.org

jeffrey.mayes@monitoringanalytics.com

evelyn.robinson@pjm.com

schmidt@sppgrp.com

dboehm@bkllawfirm.com

mkurtz@bkllawfirm.com

jkylercohn@bkllawfirm.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

mjsettineri@vorys.com

smhoward@vorys.com

glpetrucci@vorys.com

ibatikov@vorys.com

bojko@carpenterlipps.com

ghiloni@carpenterlipps.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/23/2016 1:39:12 PM

in

Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Motion for Continuance submitted by Assistant Attorney General Thomas McNamee on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio