## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of

Case No. 16-0395-EL-SSO

The Dayton Power and Light Company for

Approval of Its Electric Security Plan

:

In the Matter of the Application of

Case No. 16-0396-EL-ATA

Case No. 16-0397-EL-AAM

The Dayton Power and Light Company for

Approval of Revised Tariffs

:

In the Matter of the Application of

The Dayton Power and Light Company for Approval of Certain Accounting Authority

Pursuant to Ohio Rev. Code § 4905.13

## UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Ohio Admin. Code § 4901-1-13, The Dayton Power and Light Company ("DP&L") moves for a seven-day extension of time to respond to Industrial Energy Users-Ohio's Motion to Dismiss the Distribution Modernization Rider and Industrial Energy Users-Ohio's Motion to Dismiss, in Part, the Electric Security Plan Application Filed by The Dayton Power and Light Company with Respect to the Regulatory Compliance Rider, Uncollectible Rider, Storm Cost Recovery Rider, Reconciliation Rider, and Transmission Cost Recovery Rider-Nonbypassable, which were filed and served on November 21, 2016.

DP&L's memoranda in opposition to those motions presently must be filed within five business days, <u>i.e.</u>, November 29, 2016. Aug. 16, Entry, ¶6. Industrial Energy Users-Ohio ("IEU") has agreed to an extension of time for DP&L to respond to its motions to dismiss until

December 6, 2016. DP&L similarly has agreed to an extension of time for IEU to file its reply memoranda until December 13, 2016.

Respectfully submitted,

/s/ Charles J. Faruki

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## MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION OF TIME

On November 21, 2016, IEU filed two motions to dismiss various aspects of the October 11, 2016 Amended Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan. Industrial Energy Users-Ohio's Motion to Dismiss the Distribution Modernization Rider and Industrial Energy Users-Ohio's Motion to Dismiss, in Part, the Electric Security Plan Application Filed by The Dayton Power and Light Company with Respect to the Regulatory Compliance Rider, Uncollectible Rider, Storm Cost Recovery Rider, Reconciliation Rider, and Transmission Cost Recovery Rider-Nonbypassable.

IEU has agreed to an extension of time for DP&L to file its memoranda in opposition until December 6, 2016, and DP&L has agreed to an extension of time for IEU to file its replies until December 13, 2016.

Respectfully submitted,

/s/ Charles J. Faruki

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## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Unopposed Motion for Extension of Time

has been served via electronic mail upon the following counsel of record, this 23rd day of

November, 2016:

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Summary: Motion Unopposed Motion for Extension of Time electronically filed by Mr. Charles J. Faruki on behalf of The Dayton Power and Light Company