

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**MOTION FOR CONTINUANCE AND FOR EXTENTION OF TIME
FOR THE FILING OF TESTIMONY
ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO
AND REQUEST FOR EXPEDITED CONSIDERATION**

The Staff of the Public Utilities Commission of Ohio (Staff) respectfully requests that the date for the hearing in these matters be continued from June 6, 2017 to June 12, 2017. Staff further respectfully requests that the date for the filing of its direct testimony in this matter be further extended. Specifically, Staff requests that it be granted an extension until Friday, June 9, 2017 in which to file its testimony in this case. This request is made pursuant to O.A.C. 4901-1-13(A).

Staff makes this request pursuant to O.A.C. 4901-1-13(A) to allow the parties to determine whether negotiations are likely to resolve this case by agreement. A stipulation would permit the Commission to rule on the case expeditiously without the need for costly and time-consuming litigation. Negotiations are ongoing, but Staff believes that the parties require additional time to determine whether further negotiations are likely to be fruitful.

To enable those discussions, Staff also requests that it be granted additional time to finalize its direct testimony. By Entry issued February 7, 2017, the Commission set the deadline for filing testimony of witnesses on behalf of Staff as May 30, 2017. By motion filed May 23, 2017, Staff requested that it be given until June 6, 2017 by which to file its testimony. Given the instant request for a continuance of the hearing date, Staff requests that it be granted an additional three (3) days, until June 9, 2017, in which to file its testimony. Such an extension would both permit Staff to engage meaningfully in negotiations, and afford the Company an opportunity to review Staff testimony prior to the beginning of the proposed new hearing date.

All parties have been contacted regarding this motion pursuant to O.A.C. 4901-1-12(C). Counsel for Kroger has objected to its granting, and has indicated her intention to reply. All other parties that have responded have granted their consent to the requested extension.

WHEREFORE, Staff respectfully requests that this motion be granted without delay, and that the Commission issue an order granting a continuance of the hearing until June 12, 2017, and an extension of the filing date for the direct testimony by Staff in this matter until June 9, 2017.

Respectfully submitted,

Mike DeWine
Ohio Attorney General

/s/ Werner L. Margard III

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Continuance and for Extension of Time for the Filing of Testimony was served by email to the following parties of record, this 26th day of May, 2017.

/s/ Werner L. Margard III

Werner L. Margard III
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Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

Summary: Motion for Continuance and for Extention of Time for the Filing of Testimony electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO