

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of  
Ohio Power Company for Approval  
of Full Legal Corporate Separation  
and Amendment to Its Corporate  
Separation Plan**

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**Case No. 12-1126-EL-UNC**

**OHIO POWER COMPANY'S MOTION FOR  
EXTENSION OF PROCEDURAL SCHEDULE**

Pursuant to Rule 4901-1-13(A) of the Ohio Administrative Code, Ohio Power Company ("AEP Ohio" or the "Company") respectfully moves the Commission for an approximately 60-day extension of the procedural schedule in this proceeding in order to align the schedule in this case with the recently revised procedural schedule in the related *ESP III Extension* case, Case Nos. 16-1852-EL-SSO, *et al.* Accordingly, AEP Ohio requests that the deadlines for initial and reply comments in this case be extended to August 25, 2017, and September 11, 2017, respectively.

The grounds for this motion are set forth more fully in the attached memorandum in support.

Respectfully submitted,

/s/ Steven T. Nourse

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## **MEMORANDUM IN SUPPORT**

Rule 4901-1-13(A) of the Ohio Administrative Code permits the Commission to grant “extensions of time to file pleadings or other papers \* \* \* upon motion of any party for good cause shown.” AEP Ohio respectfully submits that good cause exists to extend the deadlines for initial and reply comments in this proceeding by approximately 60 days.

On April 7, 2017, AEP Ohio filed an application to amend its corporate separation plan in this docket. Specifically, the Company requests authority to narrowly amend its corporate separation plan to eliminate the conditions requiring liquidation of the energy from the its OVEC entitlements to facilitate the Company’s use of the OVEC entitlements to serve a portion of standard service offer (SSO) load, as it has proposed in its pending *ESP III Extension* case, Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM. On April 13, 2017, the Attorney Examiner issued an Entry that established deadlines of June 23, 2017, and July 10, 2017 for filing initial and reply comments on AEP Ohio’s application.

On June 6, 2017, the Attorney Examiner issued an Entry in the *ESP III Extension* case, continuing the evidentiary hearing in that proceeding from June to August 8, 2017, in order to afford the parties sufficient time to fully explore the possibility of reaching a resolution of some or all of the issues raised in that proceeding. The Company’s proposal to use its OVEC entitlements to serve SSO customers, which necessitated the Company’s application in this proceeding, is among those issues.

Because AEP Ohio’s application in this case and its proposals in the *ESP III Extension* case are interrelated, good cause exists to extend the procedural schedule in this case in light of the continued settlement negotiations in the *ESP III Extension* case and in order to align the two proceedings’ procedural schedules. Accordingly, AEP Ohio respectfully requests that the

deadline for initial comments on its April 7, 2017 application be extended to August 25, 2017,  
and the deadline for reply comments be extended to September 11, 2017.

Respectfully submitted,

/s/ Steven T. Nourse

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### **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Adm. Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. I hereby certify that a service copy of the foregoing *Ohio Power Company's Motion for Extension of Procedural Schedule* was served upon the following parties of record this 14th day of June, 2017, via electronic transmission.

/s/ Steven T. Nourse  
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Summary: Motion electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company