

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Jacqueline Crowder,)	
Complainant)	
)	
v.)	Case No. 17-1379-EL-CSS
)	
Ohio Power Company,)	
Respondent)	

**MOTION OF OHIO POWER COMPANY FOR SUSPENSION OR EXTENSION OF
THE PROCEDURAL SCHEDULE AND CONTINUANCE OF HEARING DATE,
REQUEST FOR SETTLEMENT CONFERENCE, AND REQUEST FOR EXPEDITED
RULING**

Pursuant to Ohio Adm. Code 4901-1-12 and 4901-1-13, Ohio Power Company (“AEP Ohio”) respectfully moves the Public Utilities Commission of Ohio (“Commission”) for an order suspending or extending the present deadline for filing direct testimony set forth in the Attorney Examiner’s September 18, 2017 Entry and continuing the hearing currently scheduled on November 2, 2017. Because the present deadline for filing testimony is Thursday, October 26, 2017, AEP Ohio also requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

Additionally, AEP Ohio respectfully requests that the Commission schedule this matter for an additional settlement conference in advance of the requested new testimony deadline and hearing date. The requested procedural schedule modifications will allow the parties to pursue a resolution of any remaining issues in this case through settlement. The grounds for this motion are set forth more fully in the accompanying memorandum in support.

Respectfully submitted,

/s/ Christen M. Blend

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Counsel for Respondent Ohio Power Company

MEMORANDUM IN SUPPORT

Rule 4901-1-13 of the Ohio Administrative Code authorizes the Attorney Examiner to grant extensions of time and continuances of public hearings upon motion and for good cause shown. Ohio Power Company (“AEP Ohio”) respectfully move the Public Utilities Commission of Ohio (“Commission”) for an order either suspending or extending the deadline for filing direct testimony, currently set for October 26, 2017, and continuing the evidentiary hearing presently scheduled on November 2, 2017. Because the present testimony deadline is Thursday, October 26, 2017, AEP Ohio also requests expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C).

On August 23, 2017, a settlement conference was held in this case in an attempt to informally resolve this matter. At the time of the settlement conference, the parties were unable to reach a resolution of the issues presented in the Complaint. However, it is AEP Ohio’s understanding that the status of Complainant’s account balances have changed since the initial settlement conference, which may have resolved or rendered moot some or all of the issues previously in dispute in this action. AEP Ohio believes that it is in both parties’ interest, and that it would promote administrative economy, to suspend or delay the testimony deadline and hearing date in order for the parties to participate in an additional settlement conference to determine whether they are able come to a resolution informally on the outstanding issues, if any, in this proceeding. At a minimum, holding an additional settlement conference would assist the parties in identifying any remaining issues in dispute to be addressed at a future hearing, which itself would foster administrative efficiency.

Additionally, irrespective of AEP Ohio's request to for a continuance to hold an additional settlement conference, the undersigned counsel for AEP Ohio respectfully requests that the hearing in this case be continued due to its conflict with another hearing before the Commission. Specifically, the hearing in this matter is presently scheduled for the second day of the previously-scheduled hearing regarding the stipulation in AEP Ohio's *ESP III Extension* case, Case Nos. 16-1852-EL-SSO, *et al.*, in which the undersigned counsel also represents AEP Ohio, and which the undersigned counsel is required to attend. Accordingly, AEP Ohio requests that the later-scheduled hearing in this case be continued to a future date that does not conflict with the *ESP III Extension* hearing.

The requested suspension or extension, continuance, and settlement conference are reasonable, will not prejudice any interested party, and will enable the parties to work towards a mutually agreeable resolution of this complaint case in light of the changes to Complainant's account status. Accordingly, for good cause shown, AEP Ohio respectfully requests that this motion be granted in its entirety.

Respectfully submitted,

/s/ Christen M. Blend

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Counsel for Respondent Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion and Memorandum in Support of Ohio Power Company was served by regular mail upon the address listed below, on this 18th day of October, 2017.

/s/ Christen M. Blend

Christen M. Blend

Jacqueline Crowder
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Complainant

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 17-1379-EL-CSS

Summary: Motion Motion of Ohio Power Company for Suspension or Extension of the Procedural Schedule and Continuance of Hearing Date, Request for Settlement Conference, and Request for Expedited Ruling electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company