

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Review of the)	Case No. 14-0255-EL-RDR
Distribution Investment Rider Contained)	Case No. 15-0066-EL-RDR
in the Tariffs of Ohio Power Company.)	Case No. 16-0021-EL-RDR

**JOINT MOTION FOR SUSPENSION OF PROCEDURAL SCHEDULE
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rules 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, the Parties¹ jointly move for an indefinite suspension of the procedural schedule in these cases. The requested suspension will allow the parties to the above-captioned proceedings to complete settlement negotiations, which are expected to resolve issues in this case between some or all of the parties.

Because AEP Ohio's direct testimony is presently due November 8, 2017, the Parties respectfully request an expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C) and certifies both that no party objects to the issuance of an immediate ruling or to the requested extension and continuance. The grounds for this motion are set forth more fully in the accompanying memorandum in support.

Respectfully submitted,

/s/ Steven T. Nourse
Steven T. Nourse (0046705), Counsel of Record
Christen M. Blend (0086881)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Telephone: (614) 716-1608
(614) 716-1915
Fax: (614) 716-2014
Email: stnourse@aep.com
cmblend@aep.com

Counsel for Ohio Power Company

¹ AEP Ohio and OCC are parties to all three proceedings; OMAEG and Kroger have only been granted intervention in the Case No.15-66-ELRDR. Staff is generally considered a party for all three proceedings per OAC 4901-1-10(C).

Michael DeWine
Ohio Attorney General
William L. Wright
Section Chief

/s/ Steven L. Beeler
Steven L. Beeler
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215-3793
614.466.4397 (telephone)
614.644.8764 (fax)
steven.beeler@ohioattorneygeneral.gov

**Counsel for Staff of the Public Utilities
Commission of Ohio**

BRUCE WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Terry L. Etter
Terry L. Etter (0067445)
Counsel of Record
Christopher Healey (0086027)
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 W. Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Telephone: Etter Direct – 614-466-7964
Telephone: Healey Direct – 614-466-9571
Terry.etter@occ.ohio.gov
Christopher.healey@occ.ohio.gov

/s/ Angela Paul Whitfield
Angela Paul Whitfield (0068774), Counsel of
Record
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Telephone: (614) 365-4100
Fax: (614) 365-9145
Email: paul@carpenterlipps.com

Counsel for The Kroger Co.

/s/ Kimberly J. Bojko

Kimberly J. Bojko (0069402), Counsel of
Record

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus, OH 43215

Telephone: (614) 365-4100

Fax: (614) 365-9145

Email: bojko@carpenterlipps.com

**Counsel for Ohio Manufacturing Association
Energy Group**

MEMORANDUM IN SUPPORT

Pursuant to Rules 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, the Parties respectfully move for suspension of the procedural schedule in this proceeding. Because the deadline for AEP Ohio's direct testimony is November 8, 2017, the Parties also request an expedited ruling in this matter pursuant to Ohio Adm. Code 4901-1-12(C).

On June 29, 2017, the Attorney Examiner issued an Entry establishing the following procedural schedule in these proceedings:

- November 1, 2017 – Deadline for AEP Ohio to file testimony
- November 9, 2017 – Deadline for intervenors to file testimony
- November 15, 2017 – Deadline for Staff to file testimony
- November 20, 2017, at 10:00 a.m. – Evidentiary hearing commences

Entry at ¶ 24 (June 29, 2017). In order to facilitate continued settlement discussions and explore whether a partial or complete settlement may be reached, AEP Ohio requested an approximately one-week extension of the testimony deadlines set forth above and a continuance of the current hearing date. In response, the Attorney Examiner expeditiously modified the procedural schedule through an October 26, 2017 Entry in this case as follows:

- November 8, 2017 – Deadline for AEP Ohio to file testimony
- November 16, 2017 – Deadline for intervenors to file testimony
- November 21, 2017 – Deadline for Staff to file testimony
- November 28, 2017, at 10:00 a.m. – Evidentiary hearing commences

The Parties have since met and continued to make progress in settlement discussions.

Consequently, and to avoid multiple additional continuance requests, the Parties respectfully request that the Attorney Examiner issue an entry indefinitely suspending the procedural schedule in these

proceedings. Following suspension of the procedural schedule, the Parties propose and commit to either file a settlement in the docket next or file a notice indicating that the settlement efforts have been otherwise concluded.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse (0046705), Counsel of Record
Christen M. Blend (0086881)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Telephone: (614) 716-1608
(614) 716-1915
Fax: (614) 716-2014
Email: stnourse@aep.com
cmblend@aep.com

Counsel for Ohio Power Company

Michael DeWine
Ohio Attorney General
William L. Wright
Section Chief

/s/ Steven L. Beeler

Steven L. Beeler
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215-3793
614.466.4397 (telephone)
614.644.8764 (fax)
steven.beeler@ohioattorneygeneral.gov

**Counsel for Staff of the Public Utilities
Commission of Ohio**

BRUCE WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Terry L. Etter

Terry L. Etter (0067445)
Counsel of Record
Christopher Healey (0086027)
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 W. Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Telephone: Etter Direct – 614-466-7964
Telephone: Healey Direct – 614-466-9571
Terry.etter@occ.ohio.gov
Christopher.healey@occ.ohio.gov

/s/ Angela Paul Whitfield

Angela Paul Whitfield (0068774), Counsel of
Record
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Telephone: (614) 365-4100
Fax: (614) 365-9145
Email: paul@carpenterlipps.com

Counsel for The Kroger Co.

/s/ Kimberly J. Bojko

Kimberly J. Bojko (0069402), Counsel of
Record
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Telephone: (614) 365-4100
Fax: (614) 365-9145
Email: bojko@carpenterlipps.com

**Counsel for Ohio Manufacturing Association
Energy Group**

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing was sent by, or on behalf of, the undersigned counsel to the following parties of record this 2nd day of November, 2017, via electronic transmission.

/s/ Steven T. Nourse

Steven T. Nourse

EMAIL SERVICE LIST

Thomas.mcnamee@ohioattorneygeneral.gov

Steven.beeler@ohioattorneygeneral.gov

Terry.etter@occ.ohio.gov

Christopher.healey@occ.ohio.gov

bojko@carpenterlipps.com

paul@carpenterlipps.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/2/2017 4:07:35 PM

in

Case No(s). 14-0255-EL-RDR, 15-0066-EL-RDR, 16-0021-EL-RDR

Summary: Motion - Joint Motion for Suspension of Procedural Schedule and Request for Expedited Ruling electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company