

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of Ohio</b>	)	
<b>Power Company for Administration of the</b>	)	
<b>Significantly Excessive Earnings Test for 2016</b>	)	<b>Case No. 17-1230-EL-UNC</b>
<b>Under Section 4928.143(F), Revised Code, and</b>	)	
<b>Rule 4901:1-35-10, Ohio Administrative Code.</b>	)	

---

**JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE  
AND REQUEST FOR EXPEDITED RULING**

---

Pursuant to Ruled 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio”), the Staff of the Public Utilities Commission of Ohio (“Staff”), and the Office of the Ohio Consumers’ Counsel (“OCC”) (collectively, “Joint Movants”) respectfully move the Public Utilities Commission of Ohio for an order suspending the procedural schedule in this case, including the hearing currently scheduled to begin February 6, 2018. Joint Movants represent all of the parties in this case and seek the requested suspension in order to allow themselves time to continue settlement negotiations, which may resolve one or more issues in this case between some or all of them.

Given the timing of this motion relative to the current hearing date, Joint Movants also request expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C) and certify that no party objects to the issuance of an immediate ruling or to the requested suspension. The grounds for this motion are set forth more fully in the accompanying memorandum in support.

Respectfully submitted,

/s/ Christen M. Blend  
Steven T. Nourse (0046705)  
Counsel of Record  
Christen M. Blend (0086881)  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215

/s/ Thomas W. McNamee (by CMB per auth.)  
Thomas W. McNamee  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 16th Floor  
Columbus, OH 43215-3414  
Tel.: (614) 466-4396

Tel.: (614) 716-1608  
(614) 716-1915  
Fax: (614) 716-2014  
stnourse@aep.com  
cmbblend@aep.com

Fax: (614) 644-8764  
thomas.mcnamee@ohioattorneygeneral.gov

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

**Counsel for Ohio Power Company**

/s/ William J. Michael (by CMB per auth.)

William J. Michael (0070921)

Counsel of Record

Christopher Healey (0086027)

Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

65 East State Street, 7th Floor

Columbus, OH 43215-4203

Tel.: (614) 466-1291

(614) 466-9571

William.michael@occ.ohio.gov

Christopher.healey@occ.ohio.gov

**Counsel for the  
Office of the Ohio Consumers' Counsel**

## **MEMORANDUM IN SUPPORT**

Pursuant to Ruled 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio”), the Staff of the Public Utilities Commission of Ohio (“Staff”), and the Office of the Ohio Consumers’ Counsel (“OCC”) (collectively, “Joint Movants”) respectfully move for an order suspending the procedural schedule in this case, including the hearing currently scheduled to begin February 6, 2018. Joint Movants also request expedited ruling on this motion pursuant to Ohio Adm. Code 4901-1-12(C), given the upcoming hearing date.

On December 7, 2017, the Attorney Examiners issued an Entry establishing the following procedural schedule in these proceedings:

- December 19, 2017 – Deadline to file motions to intervene
- January 12, 2018 – Deadline for Staff and intervenors to file testimony
- February 6, 2018 – Evidentiary hearing commences

Entry at ¶ 5 (Dec. 7, 2017).

OCC is the only intervenor in this case. Since the December 7, 2017 Entry, Staff and OCC have filed testimony and the Joint Movants have been engaged in settlement negotiations that may resolve one or all disputed issues between some or all of them. In order to facilitate continued settlement discussions and explore whether a partial or complete settlement may be reached, Joint Movants request that the procedural schedule be suspended. Joint Movants expect that they will be able to notify the Attorney Examiners whether a settlement has been reached within the next 15 days. Accordingly, to facilitate Joint Movants’ continued efforts toward resolution of this case, Joint Movants respectfully request that the existing procedural schedule in these proceedings be suspended until further order of the Attorney Examiners.

Respectfully submitted,

/s/ Christen M. Blend

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

**Counsel for Ohio Power Company**

/s/ William J. Michael (by CMB per auth.)

William J. Michael (0070921)  
Counsel of Record  
Christopher Healey (0086027)  
Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
65 East State Street, 7th Floor  
Columbus, OH 43215-4203  
Tel.: (614) 466-1291  
(614) 466-9571  
William.michael@occ.ohio.gov  
Christopher.healey@occ.ohio.gov

**Counsel for the  
Office of the Ohio Consumers' Counsel**

/s/ Thomas W. McNamee (by CMB per auth.)

Thomas W. McNamee  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 16th Floor  
Columbus, OH 43215-3414  
Tel.: (614) 466-4396  
Fax: (614) 644-8764  
thomas.mcnamee@ohioattorneygeneral.gov

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

### **CERTIFICATE OF SERVICE**

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 26th day of January, 2018, via electronic transmission.

*/s/ Christen M. Blend* \_\_\_\_\_

Christen M. Blend

[William.Michael@occ.ohio.gov](mailto:William.Michael@occ.ohio.gov)

[Christopher.Healey@occ.ohio.gov](mailto:Christopher.Healey@occ.ohio.gov)

[thomas.mcnamee@ohioattorneygeneral.gov](mailto:thomas.mcnamee@ohioattorneygeneral.gov)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/26/2018 2:36:32 PM**

**in**

**Case No(s). 17-1230-EL-UNC**

Summary: Motion - Joint Motion to Suspend Procedural Schedule and Request for Expedited Ruling electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company