

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Republic Steel,)	
)	
Complainant,)	
)	
v.)	Case No. 17-2115-EL-CSS
)	
Ohio Power Company d/b/a AEP Ohio,)	
)	
Respondent)	

**JOINT MOTION FOR A CONTINUANCE OF THE PROCEDURAL
SCHEDULE, REQUEST FOR A STATUS CONFERENCE, AND REQUEST FOR
EXPEDITED TREATMENT**

Pursuant to Ohio Adm. Code 4901-1-12, 4901-1-13, 4901-1-14, and 4901-1-26, Republic Steel and Ohio Power Company (AEP Ohio) (collectively, “the Parties”) respectfully move the Public Utilities Commission of Ohio (Commission) for a continuance of the procedural schedule in this matter to further explore settlement options. Additionally, the Parties request that the Commission schedule a status conference to take place two months from October 9, 2018, which is the date upon which the hearing on this matter is currently scheduled to commence. Finally, given the impending testimony due date, the Parties request that the Commission consider this Joint Motion on an expedited basis, pursuant to Ohio Adm. Code 4901-1-12(C).¹ As is detailed more fully in the Memorandum in Support below, the Parties are engaged in settlement discussions and

¹ As Republic Steel and AEP Ohio are the only two parties to this case, the parties can certify that no party objects to the expedited consideration of this Joint Motion.

require additional time to conduct these discussions prior to the currently scheduled hearing date. As such, good cause exists to grant this Joint Motion.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

Republic Steel filed the Complaint in this matter on October 11, 2017.² AEP Ohio filed its Answer to the Complaint on November 13, 2017.³ A settlement conference was held on February 1, 2018,⁴ and a procedural schedule was established on April 30, 2018.⁵ Pursuant to the established procedural schedule, testimony is currently due on September 28, 2018,⁶ and the hearing is to commence on October 9, 2018.⁷

The Parties have been engaged in settlement discussions in an attempt to resolve this case, and recently some progress has been made. In order to more fully pursue a settlement, the Parties require additional time to continue these discussions and explore available options for a mutually agreeable resolution of this matter. As such, the Parties respectfully request that the Commission continue the procedural schedule in this matter

² See Complaint, Request for Relief, and Request to Prevent Termination of Service (October 11, 2017).

³ See Answer of Respondent Ohio Power Company (November 13, 2017).

⁴ Id. at ¶ 12.

⁵ See Entry (April 30, 2018).

⁶ Id. at ¶ 10.

⁷ Id. at ¶ 9.

until a date established by subsequent entry. The Parties also request that the Commission schedule a status conference to update the Commission on the settlement discussions two months from the date that the hearing in this case is currently scheduled to begin.

Ohio Adm. Code 4901-1-13 provides that the Commission may grant continuances of hearings for good cause shown. Here, the parties submit that the need to continue settlement discussions serves as good cause to continue the procedural schedule as requested herein.

The Parties additionally request that the Commission consider this motion on an expedited basis pursuant to Ohio Adm. Code 4901-1-12(C). No party opposes expedited consideration of this motion.

Respectfully submitted,

/s/ Kimberly W. Bojko

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served on all parties of record via electronic mail on September 26, 2018.

/s/ Kimberly W. Bojko

Kimberly W. Bojko

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 17-2115-EL-CSS

Summary: Motion Joint Motion For A Continuance Of The Procedural Schedule, Request For A Status Conference, And Request For Expedited Treatment electronically filed by Mrs. Kimberly W. Bojko on behalf of Republic Steel