

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 16-481-EL-UNC  
Edison Company of a Grid Modernization )  
Business Plan. )

In the Matter of the Filing by Ohio Edison )  
Company, The Cleveland Electric )  
Illuminating Company, and The Toledo )  
Edison Company Application for ) Case No. 17-2436-EL-UNC  
Approval of a Distribution Platform )  
Modernization Plan. )

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo )  
Edison Company to Implement Matters ) Case No. 18-1604-EL-UNC  
Relating to the Tax Cuts and Jobs Act of )  
2017. )

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 18-1656-EL-UNC  
Edison Company for Approval of a Tariff )  
Change. )

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**MOTION TO EXTEND DEADLINE FOR FILING TESTIMONY  
AND  
MOTION FOR EXPEDITED RULING  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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The Office of the Ohio Consumers' Counsel ("OCC") respectfully requests that the Public Utilities Commission of Ohio ("PUCO") extend the deadline for filing testimony opposing the settlement in these cases. Parties continue to discuss settlement in these cases and a short extension of the deadline for filing testimony is needed for

these talks to conclude. OCC requests that the deadline be extended by three days, to January 25, 2018. OCC also asks for an expedited ruling on the motion.

The reasons why OCC's motions should be granted are set forth in the attached memorandum in support.

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Terry L. Etter

Terry L. Etter (0067445), Counsel of Record  
Christopher Healey (0086027)  
Angela O'Brien (0097579)  
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**MEMORANDUM IN SUPPORT**

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A Settlement between FirstEnergy, the PUCO Staff, and other signatory parties was filed in these cases on November 9, 2018. By Entry issued on November 15, 2018, the PUCO set a procedural that, among other things, established a deadline of January 22, 2019 for testimony opposing the Settlement. A hearing was also scheduled for February 4, 2019.

In the meantime, settlement discussions have continued among the parties in this case. These talks have been fruitful, and parties are nearing agreement or non-opposition

on major portions of the Settlement. This would obviate the need for some parties to file testimony opposing the Settlement. A short extension of the deadline to file testimony opposing the Settlement would assist in finalizing these discussions. No party would be disadvantaged by this short extension because there would still be time (one week) to depose witnesses.

That is why OCC respectfully asks the PUCO for a three-extension of the deadline – to January 25, 2019 – for filing testimony opposing the Settlement. And because the deadline is quickly approaching, OCC seeks an expedited ruling on this motion. OCC cannot certify that no party objects to this motion.<sup>1</sup> Because OCC is asking for an extension of less than five business days, the PUCO’s rules provide that an immediate ruling may be made without the filing of memoranda contra.<sup>2</sup>

Good cause exists for granting this motion. OCC requests that the PUCO grant this motion on an expedited basis.

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<sup>1</sup> Ohio Adm. Code 4901-1-12(C).

<sup>2</sup> *Id.*

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Terry L. Etter

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion was served on the persons stated below  
via electric transmission this 18<sup>th</sup> day of January 2019.

*/s/ Terry L. Etter* \_\_\_\_\_

Terry L. Etter  
Counsel of Record

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**Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-ATA**

Summary: Motion Motion to Extend Deadline for Filing Testimony and Motion for Expedited Ruling by The Office of The Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of Etter, Terry Mr.