

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of : Case No. 16-0395-EL-SSO
The Dayton Power and Light Company for
Approval of Its Electric Security Plan :

In the Matter of the Application of : Case No. 16-0396-EL-ATA
The Dayton Power and Light Company for
Approval of Revised Tariffs :

In the Matter of the Application of : Case No. 16-0397-EL-AAM
The Dayton Power and Light Company for
Approval of Certain Accounting Authority :
Pursuant to Ohio Rev. Code § 4905.13

**THE DAYTON POWER AND LIGHT COMPANY'S
MOTION FOR AN EXTENSION OF TIME TO FILE MEMORANDA
IN OPPOSITION TO APPLICATION FOR REHEARING**

EXPEDITED RULING REQUESTED

Pursuant to Ohio Adm.Code 4901-1-13(A) and for good cause shown, The Dayton Power and Light Company ("DP&L") moves for an extension of time of 10 days, *i.e.* until and through February 6, 2020, for parties to file memoranda in opposition to the Application for Rehearing by The Office of the Ohio Consumers' Counsel, filed January 17, 2020 regarding the Commission's December 18, 2019 Finding and Order.

Pursuant to Ohio Adm.Code 4901-1-12(C), DP&L requests an expedited ruling on this Motion. DP&L contacted counsel for Intervenors by electronic mail at 11:18 AM on January 22, 2020 to determine whether any party objects to the issuance of an expedited ruling. DP&L certifies that it received no objections to the issuance of an expedited ruling, and that the

following parties expressly stated their non-objection to the issuance of an expedited ruling:
Staff of the Public Utilities Commission of Ohio, Industrial Energy Users-Ohio, The Ohio
Energy Group, Wal-Mart Stores East, LP and Sam's East, Inc., Environmental Law & Policy
Center, Mid-Atlantic Renewable Energy Coalition, The Ohio Manufacturers' Association,
Interstate Gas Supply, Inc., Sierra Club, Retail Energy Supply Association, and The Kroger
Company.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF THE DAYTON POWER AND LIGHT
COMPANY'S MOTION FOR AN EXTENSION OF TIME TO FILE
MEMORANDA IN OPPOSITION TO APPLICATION FOR REHEARING**

On January 17, 2020, The Office of the Ohio Consumers' Counsel ("OCC") filed an application for rehearing as to the December 18, 2019 Finding and Order in this proceeding. By operation of administrative rule, memoranda in opposition to applications for rehearing shall be filed within 10 days. Ohio Adm.Code 4901-1-35(B). In light of the intervening holiday, the various issues raised by OCC, and the related applications for rehearing simultaneously filed in Case No. 08-1094-EL-SSO, *et al.*, there is good cause for the Commission to extend the period of time for parties to file a memoranda in opposition to OCC's application for rehearing by 10 days, *i.e.* until and through February 6, 2020. Ohio Adm.Code 4901-1-13(A).

Pursuant to Ohio Adm.Code 4901-1-12(C), DP&L requests an expedited ruling on this Motion. DP&L contacted counsel for Intervenors by electronic mail at 11:18 AM on January 22, 2020 to determine whether any party objects to the issuance of an expedited ruling. DP&L certifies that it received no objections to the issuance of an expedited ruling, and that the following parties expressly stated their non-objection to the issuance of an expedited ruling: Staff of the Public Utilities Commission of Ohio, Industrial Energy Users-Ohio, The Ohio Energy Group, Wal-Mart Stores East, LP and Sam's East, Inc., Environmental Law & Policy Center, Mid-Atlantic Renewable Energy Coalition, The Ohio Manufacturers' Association, Interstate Gas Supply, Inc., Sierra Club, Retail Energy Supply Association, and The Kroger Company.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing The Dayton Power and Light Company's Motion for an Extension of Time to File Memoranda in Opposition to Application for Rehearing has been served via electronic mail upon the following counsel of record, this 22nd day of January, 2020:

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Summary: Motion The Dayton Power and Light Company's Motion for an Extension of Time to File Memoranda in Opposition to Application for Rehearing *Expedited Ruling Requested* electronically filed by Mr. Jeffrey S Sharkey on behalf of The Dayton Power and Light Company