

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The : CASE NO. 18-1875-EL-GRD
Dayton Power and Light Company for :
Approval of Its Plan to Modernize Its :
Distribution Grid :

In the Matter of the Application of The : CASE NO. 18-1876-EL-WVR
Dayton Power and Light Company for :
Approval of a Limited Waiver of Ohio :
Adm.Code 4901:1-18-06(A)(2) :

In the Matter of the Application of The : CASE NO. 18-1877-EL-AAM
Dayton Power and Light Company for :
Approval of Certain Accounting Methods :

In the Matter of the Application of The : CASE NO. 19-1121-EL-UNC
Dayton Power and Light Company for :
Administration of the Significantly Excessive :
Earnings Test Under R.C. 4928.143(F) and :
Ohio Adm.Code 4901:1-35-10 for 2018 :

In the Matter of the Application of The : CASE NO. 20-1041-EL-UNC
Dayton Power and Light Company for :
Administration of the Significantly Excessive :
Earnings Test Under R.C. 4928.143(F) and :
Ohio Adm.Code 4901:1-35-10 for 2019 :

In the Matter of the Application of The : CASE NO. 20-0680-EL-UNC
Dayton Power and Light Company for a :
Finding That Its Current Electric Security :
Plan Passes the Significantly Excessive :
Earnings Test and More Favorable in the :
Aggregate Test in R.C. 4928.143(E) :

**MOTION OF THE DAYTON POWER AND LIGHT COMPANY D/B/A AES OHIO
FOR AN EXTENSION OF TIME TO FILE MEMORANDA IN OPPOSITION TO
APPLICATIONS 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 d/b/a AES Ohio ("AES Ohio") moves for a short extension of time of four days, i.e., until and through July 30, 2021, for parties to file memoranda in opposition to the Application for Rehearing by The Office of the Ohio Consumers' Counsel, filed July 16, 2021 regarding the Commission's June 16, 2021 Opinion and Order.

Pursuant to Ohio Adm.Code 4901-1-12(C), AES Ohio requests an expedited ruling on this Motion. AES Ohio contacted counsel for Intervenor by electronic mail at 2:25 PM on July 19, 2021 to determine whether any party objects to the requested extension or the issuance of an expedited ruling. AES Ohio certifies that The Office of the Ohio Consumers' Counsel objects to both the requested extension and the issuance of an expedited ruling without the filing of memoranda. AES further certifies that it received no other objections to the requested extension or the issuance of an expedited ruling, and that the following parties expressly stated their non-objection: Staff of the Public Utilities Commission of Ohio; Ohio Partners for Affordable Energy; Natural Resources Defense Council; Ohio Environmental Council; Mission:energy; Smart Thermostat Coalition; Ohio Hospital Association; Direct Energy, LP; Ohio Energy Group; Environmental Law & Policy Center; Sierra Club; IGS Energy; Industrial Energy Users-Ohio; and The Kroger Company.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF THE MOTION OF THE DAYTON POWER AND
LIGHT COMPANY D/B/A AES OHIO FOR AN EXTENSION OF TIME TO FILE
MEMORANDA IN OPPOSITION TO APPLICATIONS FOR REHEARING**

On July 16, 2021, The Office of the Ohio Consumers' Counsel ("OCC") filed an Application for Rehearing as to the June 16, 2021 Opinion 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 various issues raised by OCC, summer travel schedules, and the Application for Rehearing that OCC 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 memoranda in opposition to OCC's Application for Rehearing by 4 days, *i.e.* until and through July 30, 2021. Ohio Adm.Code 4901-1-13(A).

Pursuant to Ohio Adm.Code 4901-1-12(C), AES Ohio requests an expedited ruling on this Motion. AES Ohio contacted counsel for Intervenors by electronic mail at 2:25 PM on July 19, 2021 to determine whether any party objects to the requested extension or the issuance of an expedited ruling. AES Ohio certifies that The Office of the Ohio Consumers' Counsel objects to both the requested extension and the issuance of an expedited ruling without the filing of memoranda. AES further certifies that it received no other objections to the requested extension or the issuance of an expedited ruling, and that the following parties expressly stated their non-objection: Staff of the Public Utilities Commission of Ohio; Ohio Partners for Affordable Energy; Natural Resources Defense Council; Ohio Environmental Council; Mission:data; Smart Thermostat Coalition; Ohio Hospital Association; Direct Energy, LP; Ohio Energy Group; Environmental Law & Policy Center; Sierra Club; IGS Energy; Industrial Energy Users-Ohio; and The Kroger Company.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion of The Dayton Power and Light Company d/b/a AES Ohio for an Extension of Time to File Memoranda in Opposition to Application for Rehearing *Expedited Ruling Requested* has been served via electronic mail upon the following counsel of record, this 19th day of July, 2021:

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Summary: Motion Motion of The Dayton Power and Light Company d/b/a AES Ohio 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