

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Plan to Modernize Its Distribution Grid	:	CASE NO. 18-1875-EL-GRD
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In the Matter of the Application of The Dayton Power and Light Company for Approval of a Limited Waiver of Ohio Adm.Code 4901:1-18-06(A)(2)	:	CASE NO. 18-1876-EL-WVR
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Methods	:	CASE NO. 18-1877-EL-AAM
	:	
In the Matter of the Application of The 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	:	CASE NO. 19-1121-EL-UNC
	:	
In the Matter of the Application of The 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	:	CASE NO. 20-1041-EL-UNC
	:	
In the Matter of the Application of The 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)	:	CASE NO. 20-0680-EL-UNC
	:	

**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,

/s/ Michael J. Schuler

Michael J. Schuler (0082390)

AES OHIO

1065 Woodman Drive

Dayton, OH 45432

Telephone: (937) 259-7358

Telecopier: (937) 259-7178

Email: michael.schuler@aes.com

/s/ Jeffrey S. Sharkey

Jeffrey S. Sharkey (0067892)

(Counsel of Record)

D. Jeffrey Ireland (0010443)

Christopher C. Hollon (0086480)

FARUKI PLL

110 North Main Street, Suite 1600

Dayton, OH 45402

Telephone: (937) 227-3747

Telecopier: (937) 227-3717

Email: jsharkey@ficlaw.com

djireland@ficlaw.com

chollon@ficlaw.com

Counsel for AES Ohio

(willing to accept service by e-mail)

**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: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,

/s/ Michael J. Schuler

Michael J. Schuler (0082390)
AES OHIO
1065 Woodman Drive
Dayton, OH 45432
Telephone: (937) 259-7358
Telecopier: (937) 259-7178
Email: michael.schuler@aes.com

/s/ Jeffrey S. Sharkey

Jeffrey S. Sharkey (0067892)
(Counsel of Record)
D. Jeffrey Ireland (0010443)
Christopher C. Hollon (0086480)
FARUKI PLL
110 North Main Street, Suite 1600
Dayton, OH 45402
Telephone: (937) 227-3747
Telecopier: (937) 227-3717
Email: jsharkey@ficlaw.com
djireland@ficlaw.com
chollon@ficlaw.com

Counsel for AES Ohio

(willing to accept service by e-mail)

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:

Steven L. Beeler
Robert A. Eubanks
Thomas G. Lindgren
OFFICE OF THE
OHIO ATTORNEY GENERAL
PUBLIC UTILITIES SECTION
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
steven.beeler@ohioattorneygeneral.gov
robert.eubanks@ohioattorneygeneral.gov
thomas.lindgren@ohioattorneygeneral.gov

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

Steven D. Lesser
N. Trevor Alexander
Mark T. Keaney
Kari D. Hehmeyer
BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP
41 South High Street, Suite 2600
Columbus, Ohio 43215-6164
slesser@benschlaw.com
talexander@benschlaw.com
mkeaney@benschlaw.com
khehmeyer@benschlaw.com

*Counsel for the City of Dayton and
Honda of America Mfg., Inc.*

Christopher Healey
William J. Michael
Amy Botschner O'Brien
Angela O'Brien
OFFICE OF THE
OHIO CONSUMERS' COUNSEL
65 East State Street, 7th Floor
Columbus, Ohio 43215
christopher.healey@occ.ohio.gov
william.michael@occ.ohio.gov
amy.botschner.obrien@occ.ohio.gov
angela.obrien@occ.ohio.gov

Michael D. Dortch
Justin M. Dortch
KRAVITZ, BROWN & DORTCH, LLC
64 E. State Street, Suite 200
Columbus, Ohio 43215
mdortch@kravitzllc.com
jdortch@kravitzllc.com

*Counsel for Office of the
Ohio Consumers' Counsel*

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Counsel for Ohio Energy Group

Matthew R. Pritchard
Todd J. Long
MCNEES WALLACE & NURICK LLC
21 E. State Street, 17th Floor
Columbus, Ohio 43215
mpritchard@mcneeslaw.com
tlong@mcneeslaw.com

Counsel for Industrial Energy Users - Ohio

Angela Paul Whitfield
CARPENTER LIPPS & LELAND LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215

Counsel for The Kroger Co.

Devin D. Parram
Dane Stinson
Jhay T. Spottswood
BRICKER& ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
dparram@bricker.com
dstinson@bricker.com
Jspottswood@bricker.com

*Counsel for The Ohio Hospital
Association*

Christine M.T. Pirik
Madeline Fleisher
DICKINSON WRIGHT PLLC
150 East Gay Street, Suite 2400
Columbus, Ohio 43215
cpirik@dickinsonwright.com
mfleisher@dickinsonwright.com

Counsel for Mission:data Coalition

Kimberly W. Bojko
Jonathan Wygonski
CARPENTER LIPPS & LELAND LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Bojko@carpenterlipps.com
Wygonski@carpenterlipps.com

*Counsel for Ohio Manufacturers'
Association Energy Group*

Stephanie M. Chmiel
Kevin D. Oles
THOMPSON HINE LLP
41 South High Street, Suite 1700
Columbus, Ohio 43215
Stephanie.Chmiel@ThompsonHine.com
Kevin.Oles@ThompsonHine.com

Counsel for University of Dayton

David C. Rinebolt
OHIO PARTNERS FOR
AFFORDABLE ENERGY
P.O. Box 1793
Findlay, Ohio 45839

*Counsel for Ohio Partners
for Affordable Energy*

Robert Dove
KEGLER BROWN HILL + RITTER Co. L.P.A.
65 East State Street, Suite 1800
Columbus, Ohio 43215
rdove@keglerbrown.com

*Counsel for Natural Resources
Defense Council*

Madeline Fleisher
Christine M.T. Pirik
William Vorys
DICKINSON WRIGHT PLLC
150 East Gay Street, Suite 2400
Columbus, Ohio 43215
mfleisher@dicksoninwright.com
cpirik@dicksonwright.com
wvorys@dicksonwright.com

Counsel for Smart Thermostat Coalition

Caroline Cox
Rebecca Lazer, Legal Assistant
ENVIRONMENTAL LAW & POLICY CENTER
21 W. Broad Street, Suite 800
Columbus, Ohio 43215
ccox@elpc.org
rlazer@elpc.org

Nikhil Vijaykar
ENVIRONMENTAL LAW & POLICY CENTER
35 E. Wacker Dr., Suite 1600
Chicago, Illinois 60601
nvijaykar@elpc.org

*Counsel for Environmental
Law & Policy Center*

Dylan F. Borchers
Kara H. Hernstein
Jhay T, Spottswood
BRICKER& ECKLER LLP
100 South Third Street
Columbus, Ohio 43215
dborchers@bricker.com
khernstein@bricker.com
jspottswood@bricker.com

Counsel for Chargepoint, Inc.

Joseph Halso
SIERRA CLUB
ENVIRONMENTAL LAW PROGRAM
1536 Wynkoop Street
Denver, Colorado 80202
joe.halso@sierraclub.org
Richard C. Sahli
RICHARD SAHLI LAW OFFICE, LLC
981 Pinewood Lane
Columbus, Ohio 43230
rsahli@columbus.rr.com

Counsel for Sierra Club

Miranda Leppla
Trent Dougherty
Chris Tavenor
1145 Chesapeake Avenue, Suite I
Columbus, Ohio 43212
mleppla@theocc.org
tdougherty@theocc.org
ctavenor@theocc.org

Counsel for Ohio Environmental Council

Michael J. Settineri
Gretchen L. Petrucci
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
Columbus, Ohio 43215
mjsettineri@vorys.com
glpetrucci@vorys.com

Drew Romig
Armada Power LLC
230 West Street, Suite 150
Columbus, Ohio 43215
dromig@armadapower.com

Counsel for Armada Power, LLC

Bethany Allen
Joseph Oliker
Michael Nugent
IGS ENERGY
6100 Emerald Parkway
Dublin, Ohio 43016
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com

Frank P. Darr
6800 Linbrook Boulevard
Columbus, Ohio 43235
fdarr2019@gmail.com

Counsel for Interstate Gas Supply, Inc.

Mark A. Whitt
Lucas A. Fykes
WHITT STURTEVANT LLP
88 E. Broad Street, Suite 1590
Columbus, Ohio 43215
whitt@whitt-sturtevant.com
fykes@whitt0sturtevant.com

Counsel for Direct Energy, LP

/s/ Christopher C. Hollon
Christopher C. Hollon

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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