

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company to Increase Its Rates for Electric Distribution	:	CASE NO. 20-1651-EL-AIR
	:	
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority	:	CASE NO. 20-1652-EL-AAM
	:	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	:	CASE NO. 20-1653-EL-ATA
	:	

**MOTION OF THE DAYTON POWER AND LIGHT COMPANY D/B/A AES OHIO
FOR A CONTINUANCE TO OPPOSE THE APPLICATION FOR REHEARING
BY OFFICE OF THE OHIO CONSUMERS' COUNSEL**

EXPEDITED RULING REQUESTED

Pursuant to Ohio Adm. Code 4904-1-13(A) and for good cause shown, The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio") moves for a continuance of 7 days for AES Ohio's Memorandum in Opposition to the November 19, 2021 Application for Rehearing by Office of the Ohio Consumers' Counsel. The new deadline would be December 6, 2021.

Pursuant to Ohio Adm.Code 4901-1-12(C), AES Ohio requests an expedited ruling on this Motion. AES Ohio circulated a draft copy of this Motion at 9:06 a.m. November 23, 2021, and inquired whether any party would object to the relief requested or expedited treatment. AES Ohio certifies that as of the filing of this Motion, no parties have expressed any objection to the relief requested or expedited treatment, and that the Office of the Ohio Consumers' Counsel and University of Dayton expressly stated their non-opposition.

Respectfully submitted,

s/ Jeffrey S. Sharkey

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**MEMORANDUM IN SUPPORT OF MOTION OF THE DAYTON
POWER AND LIGHT COMPANY D/B/A AES OHIO FOR A
CONTINUANCE TO OPPOSE THE APPLICATION FOR
REHEARING BY OFFICE OF THE OHIO CONSUMERS' COUNSEL**

The Office of the Ohio Consumers' Counsel ("OCC") filed a motion to dismiss the application of The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio" or the "Company") for a rate increase in August 2021. Aug. 5, 2021 Motion to Dismiss DP&L's Application for a Rate Increase by Office of Ohio Consumers' Counsel. The Commission denied OCC's motion to dismiss on October 20, 2021. Oct. 20, 2021 Entry, ¶ 1. On November 19, 2021, OCC filed its Application for Rehearing by Office of the Ohio Consumers' Counsel ("Application").

OCC's Application was filed less than one week before the Thanksgiving holiday, making the opposition deadline November 29, 2021 – the Monday after Thanksgiving. The parties in this matter continue to engage in numerous discussions to determine whether a Stipulation can be reached pursuant to Ohio Adm. Code 4901-1-30. To facilitate and continue those efforts, and in consideration of the Thanksgiving holiday, AES Ohio moves for a continuance of 7 days for AES Ohio to file its opposition to OCC's Application. 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 circulated a draft copy of this Motion at 9:06 a.m. on November 23, 2021 and inquired whether any party would object to the relief requested or expedited treatment. AES Ohio certifies that as of the filing of this Motion, no parties have expressed any objection to the relief requested or expedited treatment, and that OCC and University of Dayton expressly stated their non-opposition.

Respectfully submitted,

s/ Jeffrey S. Sharkey

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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 a Continuance to Oppose the Application for Rehearing by Office of the Ohio Consumers' Counsel has been served via electronic mail upon the following counsel of record, this 23rd day of November, 2021:

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in

Case No(s). 20-1651-EL-AIR, 20-1652-EL-AAM, 20-1653-EL-ATA

Summary: Motion Motion of The Dayton Power and Light Company D/B/A AES Ohio for a Continuance to Oppose the Application for Rehearing by Office of the Ohio Consumers' Counsel electronically filed by Mr. Jeffrey S. Sharkey on behalf of The Dayton Power and Light Company