

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Dayton Power and Light Company for) Case No. 20-1651-EL-AIR
an Increase in Electric Distribution)
Rates.)

In the Matter of the Application of)
Dayton Power and Light Company to) Case No. 20-1652-EL-AAM
change accounting methods.)

In the Matter of the Application of)
Dayton Power and Light Company for) Case No. 20-1653-EL-ATA
tariff approval.)

**MOTION FOR LEAVE TO FILE
AMENDED TESTIMONY FOR JOSEPH BUCKLEY**

The Staff of the Public Utilities Commission of Ohio (Commission) respectfully requests leave to file Amended Testimony for Joseph Buckley. Counsel for Staff inadvertently filed incomplete Direct Testimony for Mr. Buckley that omitted references to Objection B of Kroger, Objection 21 of OCC, Objection II of Ohio Partners for Affordable Energy (OPAE), Objection A of Walmart, and Rate of Return Objections 1 and 2 by One Energy Enterprises (One Energy). Staff submits that the Amended Testimony of Joseph Buckley should be treated as his final testimony and the previous version disregarded. The rationale for Staff's request is more fully explained in the attached Motion.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John Jones
Section Chief

/s/ Jodi Bair

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tariff approval.)

MOTION

Staff respectfully seeks leave¹ to file Amended Testimony for Staff witness, Joseph Buckley. Counsel for Staff inadvertently filed an incomplete version of testimony for Mr. Buckley. Staff requests that the Amended Testimony of Joseph Buckley be treated as Mr. Buckley's final direct testimony for this proceeding and the previous version disregarded. To this end, Staff notes that the difference between the previously filed testimony and Amended Testimony of Joseph Buckley is that the previously filed version was incomplete as it omitted references to Objection B of Kroger, Objection 21 of OCC, Objection II of Ohio Partners for Affordable Energy (OPAE), Objection A of Walmart, and Rate of Return Objections 1 and 2 by One Energy Enterprises (One Energy). Staff respectfully requests that this Motion be granted.

¹ Staff notes that its Testimony deadline for this proceeding is January 18, 2022. Staff has not missed this deadline. However, for purposes of clarity, Staff is seeking to have the Amended version of Staff Witness Buckley's Testimony treated as the final version as the previous version was inadvertently incomplete.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John Jones
Section Chief

/s/ Jodi Bair

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Leave to File Amended Testimony for Joseph Buckley**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via regular U.S. or electronic mail upon the below parties of record, this 18th day of January 2022.

/s/ Jodi Bair

Jodi Bair

Assistant Attorney General

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

Summary: Motion for Leave to File Amended Testimony for Joseph Buckley
electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO