

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for)	
Administration of the Significantly)	Case No. 20-1006-EL-UNC
Excessive Earnings Test for 2019)	
Pursuant to R.C. 4928.143(F) and Ohio)	
Adm.Code 4901:1-35-10.)	

In the Matter of the Application of)	
Ohio Power Company for)	
Administration of the Significantly)	Case No. 21-541-EL-UNC
Excessive Earnings Test for 2020)	
Pursuant to R.C. 4928.143(F) and Ohio)	
Adm.Code 4901:1-35-10.)	

In the Matter of the Quadrennial)	
Review Required by R.C. 4928.143(E))	Case No. 21-1166-EL-UNC
for the Electric Security Plan of Ohio)	
Power Company.		

**JOINT MOTION FOR AN EXTENSION OF
TIME TO FILE TESTIMONY, CONTINUANCE OF THE EVIDENTIARY
HEARING, AND REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Adm.Code 4901-1-12, Ohio Power Company, Staff of the Public Utilities Commission of Ohio (“Staff”), Ohio Consumers’ Counsel (“OCC”), Ohio Manufacturers Association Energy Group (“OMAEG”), The Kroger Co. (“Kroger”), and Industrial Energy Users - Ohio (“IEU-Ohio”) respectfully request that the January 31, 2022 deadline for filing Staff and Intervenor testimony be extended. Additionally, the parties request a continuance of the Evidentiary Hearing currently scheduled for February 22, 2022. Good cause exists for granting this Motion because the parties are currently engaged in settlement negotiations.

Pursuant to Ohio Adm.Code 4901-1-12(C), the parties request an expedited ruling on this Motion. Good cause exists for an expedited ruling because the current deadline for filing testimony is January 31, 2022, which is less than the 15 days afforded by rule for the filing of memoranda contra and replies under Ohio Adm.Code 4901-1-12(B)(2).

The grounds for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

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Ohio Attorney General

John H. Jones
Section Chief

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On Behalf of the Staff of
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On Behalf of Applicant

/s/ Angela O'Brien

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**On Behalf of Ohio Manufacturers
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**On Behalf of Industrial Energy Users-
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/s/ Angela Paul Whitfield

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On Behalf of The Kroger Co.

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for the Electric Security Plan of Ohio)	
Power Company.)	

MEMORANDUM IN SUPPORT

Ohio Power Company, Staff, OCC, OMAEG, Kroger, and IEU-Ohio respectfully request that the procedural schedule established in the Commission's November 19, 2021 Entry be modified. Specifically, the parties request that the deadline to file Staff and Intervenor testimony be extended from January 31, 2022, to February 21, 2022. Additionally, the parties propose that the February 22, 2022 Evidentiary Hearing be continued. The parties also request an expedited ruling, and no party objects to the issuance of such a ruling. Good cause exists for the Commission to grant this Motion on an expedited

basis because the parties are engaged in settlement discussions and the proposed extension would allow time for continued negotiations.

Respectfully submitted,

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On Behalf of Ohio Manufacturers
Association Energy Group

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**On Behalf of Industrial Energy Users-
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On Behalf of The Kroger Co.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Joint Motion for Extension of Time to File Testimony, Continuance of the Evidentiary Hearing, and Request for Expedited Ruling** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served by regular U.S. mail, postage prepaid, hand-delivered, and/or electronic service upon the following parties of record, this January 20, 2022.

/s/ Thomas Lindgren

Thomas Lindgren

Assistant Attorney General

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Case No(s). 20-1006-EL-UNC, 21-0541-EL-UNC, 21-1166-EL-UNC

Summary: Motion Joint Motion for an Extension of Time to File Testimony,
Continuance of the Evidentiary Hearing, and Request for Expedited Ruling
electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO