

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Investigation into RPA Energy, Inc.'s)	
Compliance with the Ohio)	Case No. 22-441-GE-COI
Administrative Code and Potential)	
Remedial Actions for Non-)	
Compliance.)	

**STAFF MOTION TO EXTEND THE DEADLINE TO FILE THE STAFF
TESTIMONY OF NEDRA RAMSEY**

The Staff of the Public Utilities Commission of Ohio (“Staff”), pursuant to Ohio Administrative Code 4901-1-13(A), respectfully requests an extension of the September 30, 2022 due date for filing Staff Testimony. Staff respectfully requests that the Staff Testimony of Nedra Ramsey be allowed to be filed on October 3, 2022. Since the due date was September 30, 2022, Staff request that this motion be expedited.¹ Staff has contacted RPA Energy, Inc.’s (RPA’s) counsel and Ohio Consumers Counsel’s (OCC’s) counsel regarding this requested extension and request for expedited treatment and both requests are unopposed. The reasons for this motion are set forth more fully in the attached memorandum.

¹ Under O.A.C. 4901-1-12.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Robert Eubanks

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**On Behalf of the Staff of the
Public Utilities Commission of Ohio**

MEMORANDUM IN SUPPORT

Through agreement by the parties and verbal order of the Commission during the September 23, 2022 prehearing conference, September 30, 2022 was selected as the new due date for the parties to file testimony in this matter. While Staff was able to file the testimony of three of its four witnesses, Staff was unable to file the testimony of its main witness, Nedra Ramsey, due to technological difficulties with some of the audio file attachments referenced in the testimony. The narrative testimony of Nedra Ramsey was provided to the parties on September 30, 2022 via email. And, following the technological difficulties, a flash drive with the audio files was dropped off at docketing after hours on September 30, 2022 to be accepted for late filing on October 3, 2022.

Staff respectfully requests that the Staff Testimony of Nedra Ramsey be allowed to be filed on October 3, 2022. Staff has contacted RPA's counsel and OCC's counsel regarding this requested extension and request for expedited treatment and both are unopposed.

Respectfully submitted,

Dave Yost
Ohio Attorney General

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Section Chief

/s/ Robert Eubanks

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**On Behalf of the Staff of the
Public Utilities Commission of Ohio**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Staff Motion to Extend the Deadline to File the Staff Testimony of Nedra Ramsey** on behalf of the Staff of the Public Utilities Commission of Ohio, has been served upon the below-named counsel via electronic mail, this 3rd day of October 2022.

/s/ Robert Eubanks

Robert Eubanks

Assistant Attorney General

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**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

10/3/2022 10:59:02 AM

in

Case No(s). 22-0441-GE-COI

Summary: Motion Staff Motion to Extend the Deadline to File the Staff Testimony of Nedra Ramsey electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO