

**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 OF THE PUBLIC UTILITIES COMMISSION OF OHIO
MOTION TO ALLOW VIRTUAL TESTIMONY
FOR STAFF EXPERT WITNESS JENNIFER OWEN**

In accordance with Rule 4901-1-12(A), Staff of the Public Utilities Commission of Ohio (Staff) requests that Staff's expert witness, Jennifer Owen, be allowed to testify virtual during the evidentiary hearing in this matter. Staff also request expedited treatment of this motion. The parties are not opposed to this motion to allow virtual testimony for Jennifer Owen or to expedited treatment of the motion. This motion should be granted for the reasons set forth below.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Robert Eubanks

Robert Eubanks

Rhiannon Plant

(Counsel of Record)

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

MEMORANDUM IN SUPPORT

Under Rule 4901-1-12(A), the Commission may grant a motion for good cause shown. Accordingly, Staff is requesting, for good cause, that the Commission allow for Jennifer Owen to testify virtual during the hearing in this matter. Jennifer Owen testifies in a New Jersey court case on October 18, 2022, one day before the currently scheduled hearing in this matter, and lives in New Jersey. Accordingly, the Commission could avoid travel expenses and any expenses associated with rescheduling flight plans should there be future changes to the currently scheduled hearing date by allowing Jennifer Owen to testify virtually.

Given that the Commission has become very proficiency at conducting virtual hearings over the past couple of years and will already be set up to virtually accept the testimony of consumer witnesses, such an accommodation would be a minimal inconvenience for the parties and the Commission and would allow Jennifer Owen to testify in as efficient a manner as possible. The parties are not opposed to this motion to allow virtual testimony for consumer witnesses or to expedited treatment of the motion.

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**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the **Staff of the Public Utilities Commission of Ohio Motion to Allow Virtual Testimony for Staff Expert Witness** on behalf of the Staff of the Public Utilities Commission of Ohio, has been served upon the below-named counsel via electronic mail, this 12th day of October 2022.

/s/ Robert Eubanks

Robert Eubanks

Assistant Attorney General

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

Summary: Motion Staff of The Public Utilities Commission of Ohio Motion to Allow
Virtual Testimony for Staff Expert Witness Jennifer Owen electronically filed by Mrs.
Kimberly M. Naeder on behalf of PUCO