

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	
Edison Company for Authority to Establish a)	Case No. 23-301-EL-SSO
Standard Service Offer Pursuant to R.C.)	
4928.143 in the Form of an Electric Security)	
Plan.)	

**NORTHEAST OHIO PUBLIC ENERGY COUNCIL’S
MEMORANDUM CONTRA JOINT MOTION TO
EXTEND THE PROCEDURAL SCHEDULE**

On October 3, 2023, six (out of 26) intervenors in this proceeding filed a Joint Motion to Extend the Procedural Schedule established by entry of July 19, 2023. Neither Staff nor the Applicants joined the motion. Joint Movants request that intervenor testimony be delayed until December 8, 2023; that Staff testimony be delayed until December 22, 2023; and that hearing be delayed until January 8, 2024 – an extension of 60 days. Joint Movants seek the delay “to permit the parties in this case to focus their efforts at this time on settlement discussions.”¹

The Northeast Ohio Public Energy Council (“NOPEC”) does not believe good cause has been established for delay. Sufficient time was allotted by the procedural entry of July 19, 2023, for the parties to prepare testimony opposing the application. Filing intervenor and Staff testimony as ordered should not affect settlement negotiations. Moreover, a delay in hearing does not guarantee that settlement will be reached or, even with a settlement, that a lengthy hearing will ensue. The public has an interest in market certainty and that Applicants’ electric security plan be ruled upon in a timely fashion before June 1, 2024.

¹ Joint Motion at 1.

Wherefore, NOPEC respectfully requests that the Joint Motion to Extend the Procedural be denied.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Memorandum Contra* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 6th day of October 2023.



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Case No(s). 23-0301-EL-SSO

Summary: Memorandum Contra Joint Motion to Extend the Procedural Schedule
by Northeast Ohio Public Energy Council electronically filed by Teresa Orahood on
behalf of Dane Stinson.