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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of:)
The Cincinnati Gas & Electric Company for) Case No. 05-0059-EL-AIR
an Increase in Electric Distribution Rates)

In the Matter of the Application of)
The Cincinnati Gas & Electric Company for) Case No. 05-0060-EL-AAM
Approval to Change Accounting Methods.)

THE CINCINNATI GAS & ELECTRIC COMPANY'S
MOTION FOR AN EXTENSION OF TIME TO COMPLY
WITH THE ATTORNEY EXAMINER'S
ENTRY OF APRIL 20, 2005

The Cincinnati Gas & Electric Company ("CG&E,") by and through its attorneys and pursuant to O.A.C. Section 4901-1-13, hereby respectfully moves the Public Utility Commission ("Commission") for the entry of an order which grants CG&E an extension of time to submit redactions to the testimony of its witnesses Schrader and Procario, and an extension of time to file a redacted copy of the Infrastructure Services Agreement as ordered in the March 20, 2005 Order Entry of the Commission. The basis for this motion is set forth in the accompanying memorandum.

Respectfully submitted,



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MEMORANDUM IN SUPPORT OF
THE CINCINNATI GAS & ELECTRIC COMPANY'S
MOTION FOR AN EXTENSION OF TIME TO COMPLY
WITH THE ATTORNEY EXAMINER'S ENTRY OF APRIL 20, 2005

On February 17, 2005, The Cincinnati Gas & Electric Company ("CG&E") filed an application to increase its electric distribution rates. On March 3, 2005, CG&E filed its second motion for a protective order, seeking to maintain as confidential certain portions of the prefiled direct testimony of Steven E. Schrader and John C. Procario that discuss the Infrastructure Services Agreement between CG&E and CCB Ohio, Inc. (the "ISA.") On April 20, 2005, the Attorney Examiner issued an Entry denying in part and granting in part CG&E's request to keep the direct testimony of Schrader and Procario confidential. In addition the Attorney Examiner directed CG&E to file the ISA in the public record after making necessary redactions. April 20, 2005 Entry at ¶ 11.

CG&E has been informed by CCB Ohio, LLC ("CCB") that CCB intends to seek leave to intervene in this matter for the purpose of pursuing its own motion for a protective order concerning the ISA. CG&E therefore respectfully requests that the Commission grant CG&E an extension of time to comply with the April 20, 2005 Entry. CG&E requests that it be directed to file the redacted testimony and the redacted ISA ten (10) days after the Commission rules on

CCB's motion for leave to intervene, if denied; or if CCB's motion for leave to intervene is granted, until 10 days after the Commission rules on CCB's motion for protective order.

CG&E is concerned that if CG&E files redacted testimony and a redacted version of the ISA before CCB has an opportunity to be heard by this Commission, CG&E might thereby disclose information or documents that the Commission later determines CCB is entitled to protect. Granting CG&E an extension of time to comply with the Commission's April 20, 2005 Entry until after the Commission has heard CCB would not unduly delay the proceeding or unduly prejudice any existing party.

Accordingly, CG&E respectfully requests that the Commission grant its request for an extension in accordance with O.A.C. Section 4901-1-13.

Respectfully submitted,



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