FILE

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PUCO EXHIBIT FILING

Date of Hearing: 9/15/2015

Case No. 14-1297-EL-SSO

PUCO Case Caption: In the Matter of the Application of Ohio Edison, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

List of exhibits being filed: Volume XI

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Reporter's Signature: Karen Sue Gibson

Date Submitted: 9/29/15

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.	:	Case No. 14-1297-EL-SSO

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PROCEEDINGS

before Mr. Gregory Price, Ms. Mandy Chiles, and Ms. Megan Addison, Attorney Examiners, at the Public Utilities Commission of Ohio, 180 East Broad Street, Room 11-A, Columbus, Ohio, called at 9 a.m. on Tuesday, September 15, 2015.

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VOLUME XI

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ARMSTRONG & OKEY, INC.
222 East Town Street, Second Floor
Columbus, Ohio 43215-5201
(614) 224-9481 - (800) 223-9481
Fax - (614) 224-5724

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P3-EPSA Set 2
Witness: Donald Moul
As to Objections: Carrie M. Dunn

Case No. 14-1297-EL-SSO
Ohio Edison Company, The Cleveland Electric Illuminating Company and
The Toledo Edison Company for Authority to Provide for a Standard Service Offer
Pursuant to R.C. § 4928.143 in the Form of an Electric Security Plan

RESPONSES TO REQUEST

P3-EPSA Set 2 – INT-59 With respect to Mr. Moul's testimony regarding the uncertain economic environment that the plants are operating within currently:

a. Please explain the economic analysis that the company would undertake to evaluate whether retirement of a generating unit, or units, would be economical.
b. Has the company undertaken any retirement studies for any of its units? If so, please provide copies of those studies.
c. In addition, please explain whether consideration of possible plant retirement influenced the RPM base residual capacity market offers made in the 2016/2017 delivery year auction for the Sammis generating units. If so, please provide the analysis used to develop the Sammis generating unit offers in the 2016/2017 PJM RPM auction.

Response:

a. Objection. The request is vague, ambiguous and overbroad in its failure to define "company," which is assumed to mean FirstEnergy Solutions Corp., calls for speculation, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further, it seeks information which is not in the Companies' possession, custody or control. Subject to and without waiving the foregoing objections, the Companies state as follows: a possible economic analysis of the generating unit(s) that could be undertaken would be to assess for economic profitability or loss. The economic analysis would need to demonstrate that continued operation of the generating unit(s) would protect the shareholder's interest by being profitable, providing a sufficient return on investment and to recapitalize the business to maintain a "going concern" status.

b. Objection. The request is vague and ambiguous because it does not define "retirement studies" or "company" which is assumed to mean FirstEnergy Solutions Corp., seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and seeks information which is not in the Companies' possession, custody or control. Subject to and without waiving the foregoing objections, the Companies state as follows: No such analysis has been undertaken for Sammis or Davis-Besse.

c. Objection. This request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and seeks information which is not in the Companies' possession, custody or control. Further, the request seeks information that is competitively sensitive and confidential and cannot be adequately protected by a nondisclosure agreement. Divulging offer strategies in proceedings in which the parties include other participants in the PJM markets will put the divulging party at a severe competitive disadvantage and interfere with the operation of PJM markets.

PENGAD 800-631-6989
EXHIBIT
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