

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Commission's
Review of Ohio Administrative Code,
Chapters 4901:5-1, 4901:5-3, 4901:5-5,
and 4901:5-7**

Case No. 15-53-GE-ORD

**REPLY COMMENTS OF OHIO EDISON COMPANY,
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND
THE TOLEDO EDISON COMPANY**

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Come now Ohio Edison Company (“Ohio Edison”), The Cleveland Electric Illuminating Company (“CEI”), and The Toledo Edison Company (“Toledo Edison”) (collectively, the “Companies”), by counsel, and, pursuant to the Public Utilities Commission of Ohio Entry issued November 18, 2015, (“Entry”), and December 15, 2015, (“Second Entry”) respectfully submit their reply comments in this proceeding.

I. COMMENTS

On February 1, 2016, the Office of the Ohio Consumers’ Counsel (“OCC”) and Duke Energy Ohio each filed Comments in this proceeding. The sole recommendation proposed by the OCC is the addition of language to require utilities to include a table containing the total amount of distributed generation capacity in megawatts by fuel type. However, the Companies respectfully note that this information is already reported to the Commission as required by the Market Monitoring rule, Section 4901:1-25-02(A)(2)(c), Ohio Administrative Code. The OCC’s recommendation should be rejected as redundant, wasteful, and unnecessary.

The Companies support the recommendations proposed by Duke Energy Ohio to revise the rules to reflect the reality that electric distribution utilities in Ohio do not own generation, that transmission is regulated by FERC, and that resource planning has been replaced by the competitive bid process pursuant to approved standard service offers.

II. CONCLUSION

The Companies again appreciate the opportunity to provide reply comments on the matters raised in the initial comments filed in this proceeding. The Companies urge the Commission to consider the comments of the Companies set forth above.

/s/ James W. Burk

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CERTIFICATE OF SERVICE

I certify that these comments were filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 22nd day of February, 2016. The Commission's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Robert M. Endris

*One of the Attorneys for Ohio Edison
Company, The Cleveland Electric
Illuminating Company and The Toledo
Edison Company*

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in

Case No(s). 15-0053-GE-ORD

Summary: Comments Reply Comments of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company electronically filed by Mr. Robert M. Endris on behalf of Burk, James W. Mr.