

**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	)	Case No. 14-1297-EL-SSO
Company for Authority to Provide for a	)	
Standard Service Offer Pursuant to R.C.	)	
§4928.143 in the Form of an Electric Security	)	
Plan.	)	

JOINT MOTION TO STRIKE FIRSTENERGY’S MAY 4, 2016 CORRESPONDENCE

The PJM Power Providers Group (“P3”)¹ and the Electric Power Supply Association (“EPSA”)² jointly move this Commission to strike the correspondence filed on May 4, 2016 by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively “FirstEnergy”). FirstEnergy’s correspondence is nothing more than an attempt to support the new retail rider that FirstEnergy proposed for the first time in the memorandum in support to FirstEnergy’s May 2, 2016 application for rehearing.

For example, FirstEnergy claims in its May 4, 2016 correspondence that the “Signatory Parties” support FirstEnergy’s “modest modification” to Rider RRS. This claim, like other claims made by FirstEnergy in the correspondence, shows that FirstEnergy’s

¹ P3 is a non-profit organization whose members are energy providers in the PJM Interconnection LLC (“PJM”) region, conduct business in the PJM balancing authority area, and are signatories to various PJM agreements. Altogether, P3 members own over 84,000 megawatts (“MWs”) of generation assets, produce enough power to supply over 20 million homes, and employ over 40,000 people in the PJM region, representing 13 states and the District of Columbia. This brief does not necessarily reflect the specific views of any particular member of P3 with respect to any argument or issue, but collectively presents P3’s positions.

² EPSA is a national trade association representing leading competitive power suppliers, including generators and marketers. Competitive suppliers, which collectively account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities. EPSA seeks to bring the benefits of competition to all power customers. This brief does not necessarily reflect the specific views of any particular member of EPSA with respect to any argument or issue, but collectively presents EPSA’s positions.

correspondence is simply an unauthorized supplement to its May 2, 2016 memorandum supporting its application for rehearing.

Nothing in Section 4903.10 of the Ohio Revised Code allows a party to supplement an application for rehearing after the statutory period for rehearing has passed. Likewise, nothing in Ohio Administrative Code Rule 4901-1-35 allows FirstEnergy to supplement its memorandum in support after the 30-day rehearing period. Yet, contrary to this Commission's rules, FirstEnergy filed correspondence to support its new rider proposal, which was proposed for the first time in FirstEnergy's May 2, 2016 memorandum in support of the application for rehearing. It is irrelevant that FirstEnergy claims to speak on behalf of the "Signatory Parties." FirstEnergy wrote the letter and filed the letter with the sole purpose of supporting its application for rehearing and its new rider proposal.

P3/EPSC will file its memorandum contra to the applications for rehearing by May 12, 2016, in accordance with the Attorney Examiner's May 2, 2016 entry in this matter. As to FirstEnergy's correspondence, the Commission should strike it as an unauthorized supplement to its application for rehearing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 5th day of May 2016.

/s/ Gretchen L. Petrucci

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Summary: Motion -- Joint Motion to Strike FirstEnergy's May 4, 2016 Correspondence electronically filed by Mrs. Gretchen L. Petrucci on behalf of PJM Power Providers Group and Electric Power Supply Association