

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**IN THE MATTER OF THE POWERFORWARD
COLLABORATIVE**

CASE No. 18-1595-EL-GRD

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

INTRODUCTION

Pursuant to the Attorney Examiner’s Entry on November 14, 2018, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the “Companies”) hereby submit comments on the proposed status report of the Companies’ grid architecture (the “Grid Architecture Status Report” or the “Report”), which is proposed as part of the Commission’s PowerForward grid modernization initiative. The Companies look forward to collaborating with the Commission, Commission Staff, and other interested parties on the steps outlined in the PowerForward Roadmap. The Companies appreciate the opportunity to comment and request that the Commission consider and implement these comments and recommendations into the final requirements for the Grid Architecture Status Report.

COMMENTS

1. Grid Architecture Status Report Filing Deadline

The Companies agree with the Attorney Examiner’s proposed filing date of April 1, 2019 for the Companies’ Grid Architecture Status Report.

2. Contents of the Grid Architecture Status Report

The PowerForward Roadmap lists the groups of technologies that the Commission views as the core components of the distribution platform, and that the Commission contemplates will be discussed in the Companies' Grid Architecture Status Report¹. The Companies will, to the extent possible, provide a status update on the deployment of each of these components. However, the content of the Companies' Grid Architecture Status Report will depend on, and may be limited by, the approved grid modernization programs that are in effect for the Companies at the time the Grid Architecture Status Report is filed.

In addition, as the requirements for the Report are developed, the Companies anticipate that there could be concerns about filing proprietary or confidential information, including critical energy infrastructure information. The Companies suggest that the level of detail for the Report be carefully weighed in order to mitigate these confidentiality concerns, and recommend that any such confidential or proprietary information not be included in the Report filed April 1, 2019. The Companies will work collaboratively with the Commission to ensure proper protections are in place prior to the Companies' submission of any such information to the Commission as part of PowerForward.

CONCLUSION

The Companies respectfully urge the Commission to adopt the comments and recommendations of the Companies set forth above. The Companies request the opportunity to file reply comments following their review of the other comments filed in the above-captioned proceeding.

¹ See PowerForward Roadmap at 16-17.

Respectfully submitted,

/s/ Emily V. Danford

Emily V. Danford (#0090747)

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*On behalf of Ohio Edison Company,
The Toledo Edison Company, and
The Cleveland Electric Illuminating
Company*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Comments of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company were filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 4th day of December 2018. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Emily V. Danford
An Attorney for Ohio Edison
Company, The Toledo Edison
Company, and The Cleveland
Electric Illuminating Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/4/2018 3:54:59 PM

in

Case No(s). 18-1595-EL-GRD

Summary: Comments of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company electronically filed by Ms. Emily V Danford on behalf of The Cleveland Electric Illuminating Company and Ohio Edison Company and The Toledo Edison Company