

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2017 Review of the :
Delivery Capital Recovery Rider :
Contained in the Tariffs of Ohio Edison : Case No. 17-2009-EL-RDR
Company, the Cleveland Electric :
Illuminating Company, and the Toledo :
Edison Company. :

**COMMENTS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Dave Yost
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May 10, 2019

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On April 5, 2019 the attorney examiner issued an Entry in this case establishing May 10th, 2019 as the due date for comments in this proceeding. Staff has compared the results of the compliance review conducted by the Auditor in the subsequent 2018 DCR Annual Compliance Audit (18-1542-EL-RDR) with the recommendations made in this audit and has confirmed that all the recommendations made by the Auditor in this audit have been implemented except for two: the TCJA related recommendations, which have been addressed in the Stipulation pending in Case No. 18-1604-EL-UNC, and the accounting treatment of expenses related to vegetation management. Therefore, Staff's comments are directed solely at the recommendation made by Blue Ridge Consulting (the Auditor) regarding the capitalization policy of the Companies with respect to vegetation management. Staff supports the recommendations made by the Auditor.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Robert A. Eubanks _____

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Comments** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 10th day of May, 2019.

/s/ Robert A. Eubanks

Robert A. Eubanks
Assistant Attorney General

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Case No(s). 17-2009-EL-RDR

Summary: Comments electronically filed by Ms. Yvette L Yip on behalf of the Public Utilities
Commission of Ohio