

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Long-Term Forecasting)	
Report of Ohio Edison Company, The)	Case No. 20-657-EL-FOR
Cleveland Electric Illuminating Company,)	
The Toledo Edison Company and American)	
Transmission Systems Incorporated)	

**MOTION OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY, THE TOLEDO EDISON COMPANY AND AMERICAN
TRANSMISSION SYSTEMS, INC.
FOR WAIVER AND REQUEST FOR EXPEDITED RULING**

Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company, and American Transmission Systems, Inc., (collectively, the “Companies”) respectfully request a limited waiver of certain provisions set forth in the Commission’s rules that require contemporaneous provision of hard copies of their Long-Term Forecast Report (“LTFR”). Specifically, Ohio Adm. Code 4901:5-3-01(C) requires a number of bound hard copies be provided to Staff; Ohio Adm. Code 4901:5-1-03(F) requires delivery or mailing to the Office of the Ohio Consumers’ Counsel (“OCC”); and Ohio Adm. Code 4901:5-1-03(G) requires notices to be mailed to libraries. The Companies request that the Commission grant this motion on an expedited basis. Because no parties have intervened in this docket, no party objects to the issuance of an expedited ruling under O.A.C. 4901-1-12(C).

Respectfully submitted,

/s/ Robert M. Endris

Robert M. Endris (0089886)
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308
Telephone: (330) 384-5728

E-mail: rendris@firstenergycorp.com

Attorney for Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company and American Transmission Systems, Inc.

MEMORANDUM IN SUPPORT

I. THE GOVERNOR'S DECLARATION OF A STATE OF EMERGENCY AND RELATED DIRECTIVES OF THE COMMISSION AND THE OHIO DEPARTMENT OF HEALTH PROVIDE GOOD CAUSE TO WAIVE THE MAILING AND HARD COPY REQUIREMENTS AT THIS TIME

Ohio Adm. Code 4901:5-1-03(F) requires a reporting person, on the same day the LTFR is filed with the Commission, to deliver or mail a copy of the LTFR to the Ohio Consumers' Counsel ("OCC") at OCC's offices in Columbus. Ohio Adm. Code 4901:5-1-03(G) requires, within three days of filing with the Commission, a reporting person to deliver or send by first class mail a letter of notification to the main public library in each county that the reporting person services and in each county in which any portion of a major utility facility is to be located during the forecast period. Ohio Adm. Code 4901:5-3-01(C) requires each electric transmission owner or electric utility to provide a number of bound paper copies of the company's LTFR to the Commission upon the LTFR's submission.

There is good cause for a limited waiver of the mailing and hard copy requirements in Ohio Adm. Code 4901:5-3-01(C) and 4901:5-1-03(F) and (G). On March 9, 2020, the Governor signed Executive Order 2020-01D ("Executive Order"), declaring a state of emergency to help combat the spread of COVID-19. On March 22, 2020, the Ohio Department of Health issued a "Stay-at-Home" order. On April 2, 2020, the Stay-at-Home order was amended to extend to May 1, 2020. In addition, on March 20, 2020, the Commission directed public utilities to suspend activities that may create unnecessary COVID-19 risks associated with social contact. *In the Matter of the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC. Consistent with these directives, the Companies' employees are working from home.

While working from home to support Ohio's directives to prevent the spread of COVID-19 through unnecessary social contact, the Companies' employees lack access to the bulk printing, binding, and mailing equipment and services necessary to provide the hard copies required by the Commission's rules cited above. The Companies hereby respectfully request that the Commission waive the requirements of the specific rules cited above until seven days after the Stay-at-Home order and other similar directives to work at home are ended and the Companies' employees again have access to bulk printing, binding, and mailing equipment and services.

The Commission has waived these same requirements at the request of Ohio Power Company in Case No. 20-501-EL-FOR.¹ This precedent provides ample support for a finding of good cause in this case.

¹ *In the Matter of the 2020 Long-Term Forecast Report of Ohio Power Company and Related Matters*, Case No. 20-501-EL-FOR, Entry (April 6, 2020).

II. CONCLUSION

For the reasons set forth above, the Companies respectfully request that the Commission grant this Motion on an expedited basis by waiving the mailing and hard copy requirements in Ohio Adm. Code 4901:5-3-01(C) and 4901:5-1-03(F) and (G) as requested herein.

Respectfully submitted,

/s/ Robert M. Endris

Robert M. Endris (0089886)

FirstEnergy Service Company

76 S. Main Street

Akron, OH 44308

Telephone: (330) 384-5728

Facsimile: (330) 384-3875

E-mail: rendris@firstenergycorp.com

Attorney for Ohio Edison Company, The
Cleveland Electric Illuminating Company, The
Toledo Edison Company and American
Transmission Systems, Inc.

CERTIFICATE OF SERVICE

I certify that this Motion for Waiver and Request for Expedited Ruling was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 15th day of April, 2020.

/s/ Robert M. Endris
*One of the Attorneys for Ohio Edison
Company, The Cleveland Electric
Illuminating Company, The Toledo
Edison Company, and American Transmission
Systems, Inc.*

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in

Case No(s). 20-0657-EL-FOR

Summary: Motion Motion of Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company, and American Transmission Systems, Inc. for Waiver and Expedited Ruling electronically filed by Mr Robert M Endris on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company and American Transmission Systems, Inc.