

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Filing By)	CASE NO. 16-481-EL-UNC
Ohio Edison Company, The)	
Cleveland Electric Illuminating)	
Company And The Toledo Edison)	
Company Of A Grid Modernization)	
Business Plan.)	

In The Matter Of The Filing By)	CASE NO. 17-2436-EL-UNC
Ohio Edison Company, The)	
Cleveland Electric Illuminating)	
Company And The Toledo Edison)	
Company Of An Application For)	
Approval Of A Distribution)	
Platform Modernization Plan)	

In The Matter Of The Application)	CASE NO. 18-1604-EL-UNC
Of Ohio Edison Company, The)	
Cleveland Electric Illuminating)	
Company And The Toledo Edison)	
Company To Implement Matters)	
Relating To The Tax Cuts And Jobs)	
Act Of 2017.)	

In The Matter Of The Application)	CASE NO. 18-1656-EL-ATA
Of Ohio Edison Company, The)	
Cleveland Electric Illuminating)	
Company And The Toledo Edison)	
Company For Approval Of A Tariff)	
Change)	

**MOTION FOR EXTENSION OF TIME
TO FILE AUDIT REPORT WITH COMMISSION,
AND REQUEST FOR EXPEDITED RULING**

The Staff of the Public Utilities Commission of Ohio (Staff) moves for an extension of the deadline for the final audit report provided for in the Attorney Examiner's Entry of September 16, 2022.

Staff further requests that the Commission grant its motion on an expedited basis pursuant to Ohio Adm. Code 4901-1-12(C) and certifies both that no party objects to the

issuance of an immediate ruling or to the requested extension of the deadlines identified above.

The grounds for this motion are set forth in the accompanying memorandum in support.

Respectfully submitted,

David Yost (0056290)
Attorney General

John H. Jones (0051913)
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General
Public Utilities Section
30 E. Broad St., 26th Floor
Columbus, OH 43215
Tel.: (614) 466-4395
Fax: (614) 644-8764
Thomas.Lindgren@OhioAGO.gov

*Counsel for Staff of the
Public Utilities Commission of Ohio*

MEMORANDUM IN SUPPORT

By Entry of March 9, 2022, these cases involve a review of the operational benefits associated with the first phase of the grid modernization plan of the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the Companies). On April 20, 2022, the Public Utilities Commission of Ohio (Commission) selected Daymark Energy Advisors, Inc. (Daymark or Auditor) to conduct the audit services necessary to assist the Commission with the review. The Entry, pursuant to paragraph 16, incorporated the terms and the conditions of the Request for Proposal (RFP) into the contract between FirstEnergy and Daymark.

Pursuant to the Attorney Examiner's September 16, 2022 Entry, the final audit report is to be filed by October 14, 2022. Staff will require additional time to complete its review of the draft audit report in light of the complexity of the audit and Staff's other obligations. Therefore, Staff requests an extension until November 14, 2022 for the filing of the final audit report.

Ohio Adm. Code 4901-1-12(C) allows the Commission to consider a motion on an expedited basis. Staff respectfully requests an expedited ruling that the deadline be extended as requested in this motion. Counsel has contacted all parties to ascertain whether any party has an objection to consideration of this motion on an expedited basis. Although responses have not been received from all parties, to date no party that has responded has expressed any objection to the extension or to an expedited ruling.

Respectfully submitted,

David Yost (0056290)
Attorney General

John H. Jones (0051913)
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorneys General
Public Utilities Section
30 E. Broad St., 26th Floor
Columbus, OH 43215
Tel.: (614) 466-4395
Fax: (614) 644-8764
thomas.lindgren@OhioAGO.gov

*Counsel for Staff of the
Public Utilities Commission of Ohio*

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension of Time to File Final Audit Report with Commission, and Request for Expedited Ruling, and Memorandum in Support** was served by regular U.S. mail, postage prepaid, electronic mail, or hand-delivered, upon the following parties of record, this 12th day of October, 2022.

/s/ Thomas G. Lindgren

Thomas G. Lindgren

Assistant Attorney General

PARTIES OF RECORD:

Matthew R. Pritchard (Counsel of Record)
MCNEES WALLACE & NURICK LLC
21 East State Street, 17TH Floor
Columbus, OH 43215
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
mpritchard@mcneeslaw.com

Counsel for Industrial Energy Users-Ohio

Glenn S. Krassen
BRICKER & ECKLER LLP
1001 Lakeside Avenue, Suite 1350
Cleveland, OH 44114
Telephone: (216) 523-5405
Facsimile: (216) 523-7071
gkrassen@bricker.com

Dane Stinson
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: (614) 227-4854

Michael L. Kurtz, Esq.
Kurt I. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: (513)421-2255
Fax: (513)421-2764
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Counsel for The Ohio Energy Group

Trent Dougherty
1145 Chesapeake Avenue, Suite I
Columbus, OH 43212
(614) 487-5825
tdougherty@theOEC.org

Counsel for the Ohio Environmental Council

Facsimile: (614) 227-2390
dstinson@bricker.com

*Attorneys for Northeast Ohio Public Energy
Council*

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Telephone: (614)-365-4100
Bojko@carpenterlipps.com

Counsel for OMAEG

Matthew W. Warnock
Dylan F. Borchers
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2388; 227-4914
Facsimile: (614) 227-2390
mwarnock@bricker.com
dborchers@bricker.com

Gretchen L. Petrucci
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
Tel. (614) 464-5407
glpetrucci@vorys.com

*Attorney for the Ohio Cable
Telecommunications Association*

Brian J. Knipe (Counsel of Record)
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
bknipe@firstenergycorp.com
330-384-5795
330-384-3875 (fax)

James F. Lang
Mark T. Keaney
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, Ohio 44114
(216) 622-8200
(216) 241-0816 (fax)
jlang@calfee.com
mkeaney@calfee.com

*Attorneys for Ohio Edison Company, The
Cleveland Electric Illuminating Company,
And The Toledo Edison Company*

Robert Dove

Kegler Brown Hill + Ritter Co., L.P.A.
65 E State St, Ste. 1800
Columbus, OH 43215-4295
Office; (614) 462-5443
Fax: (614) 464-2634
rdove@keglerbrown.com

*Counsel for Natural Resources Defense
Council*

Bethany Allen

Counsel of Record

Joseph Olikier**Michael Nugent**

IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com

Attorneys for IGS

Rob Kelter**Janean Weber**

Environmental Law & Policy Center
21 W. Broad St., 8th Floor
Columbus, OH 43215
(614) 569-3827
mkelter@elpc.org
jweber@elpc.org

*Counsel for the
Environmental Law & Policy Center*

Attorney Examiner:

Megan.addison@puc.state.oh.us
Gregory.price@puc.state.oh.us

Michael D. Dortch

Kravitz, Brown & Dortch
65 East State Street, Suite 200
Columbus, OH 43215
mdortch@kravitzllc.com

Mark A. Whitt

Whitt Sturtevant LLP
88 E. Broad St. Suite 1590
Columbus, OH 43215
Telephone: (614) 224-3911
whitt@whitt-sturtevant.com

Angela O'Brien (Counsel of Record)
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215-4213
Telephone: [O'Brien] (614) 466-9531

angela.obrien@occ.ohio.gov

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
10/12/2022 1:06:58 PM**

in

**Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-
ATA**

Summary: Motion for Extension of Time to File Audit Report with Commission, and
Request for Expedited Ruling electronically filed by Mrs. Kimberly M. Naeder on
behalf of PUCO