



U. S. Department of Justice

*United States Attorney
Southern District of Ohio*

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August 9, 2023

By Electronic and Certified U.S. Mail
Public Utilities Commission of Ohio
c/o Angela Hawkins, Esq.
180 E. Broad Street
Columbus, Ohio 43215

Re: Case Nos. 20-1502-EL-UNC
17-974-EL-UNC
17-2474-EL-RDR
20-1629-EL-RDR

Dear Commissioners,

This letter is sent pursuant to 28 U.S.C. S 517 to request that the Public Utilities Commission of Ohio ("PUCO") stay all discovery in the above-referenced proceedings (the "PUCO Proceedings").

As you are aware, the United States is conducting an ongoing investigation into corruption relating to Ohio House Bill 6 and action through the Public Utilities Commission of Ohio ('PUCO'). The United States' ongoing investigation has resulted in a Deferred Prosecution Agreement with FirstEnergy Corp. and convictions of multiple individuals.

The United States understands that substantial discovery is underway in the PUCO Proceedings, including written discovery and the potential for depositions of numerous individuals and entities. The PUCO Proceedings involve issues related to U. S. Department of Justice the United States' investigation, and the United States believes that continued discovery in the PUCO Proceedings may directly interfere with or impede the United States' ongoing investigation.¹ For that reason,

¹ PUCO has recognized the importance of not interfering with the United States' investigation. *See IN THE MATTER OF THE 2020 REWE OF THE DELIVERY CAPITAL RECOVERY RIDER OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY*, Case No. 20-1629-EL-RDRR, Entry Dec. 15, 2021, at para. 14

the United States respectfully requests that PUCO stay the PUCO Proceedings for a period of six months from the date of this letter. The United States reserves its right to request that the stay be extended beyond this time.

We appreciate your prompt attention to this request. Please let us know if you have any questions.

Very truly yours,



KENNETH L. PARKER
United States Attorney

CC: Karl P. Kadon
Emily N. Glatfelter
Matthew C. Singer

(PUCO).

**This foregoing document was electronically filed with the Public Utilities
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in

**Case No(s). 20-1502-EL-UNC, 17-0974-EL-UNC, 17-2474-EL-RDR, 20-1629-EL-
RDR**

Summary: Correspondence from the U.S. Department of Justice dated August 9, 2023 requesting a stay of discovery. electronically filed by Ms. Mary E. Fischer on behalf of Public Utilities Commission of Ohio.