**UNITED STATES OF AMERICA**

**BEFORE THE**

**FEDERAL ENERGY REGULATORY COMMISSION**

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| Electric Power Supply Association, Retail Energy supply Association, Dynegy, Inc., Eastern Interconnection, LLC, NRG Power Marketing, LLC, and GenOn Energy Management, LLC,  Complainants,  v.  FirstEnergy Solutions Corporation, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company,  Respondents. | :  :  : :  : : : : : : : : : : : : | Docket No. EL16-34-000 |

**MOTION TO FILE COMMENTS  
SUBMITTED ON BEHALF OF**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

The Public Utilities Commission of Ohio (PUCO) respectfully requests leave of the Federal Energy Regulatory Commission (Commission) to file the attached comments.

The PUCO did not provide timely comments in this case because, at the time com­ments were due, a decision on case before it, specifically, *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan,* PUCO Case No. 14-

1297-EL-SSO, was pending. That decision, though still subject to rehearing, has now been made and lodged with the Commission. Some aspects of that decision may be use­ful for the Commission in its consideration of this case. To that end, the PUCO has attached comments which are a verbatim duplication of other comments being submitted by the PUCO today in this Commission’s case numbers EL16-49 and EL16-33. By accepting these late-filed comments, this Commission will have a more complete record for its consideration. These comments were prepared as quickly as was possible consid­ering the PUCO’s examination of its own case and its requirement to approve comments only through public meetings which only occur weekly. These two considerations did not permit the PUCO to act until now. The PUCO does not believe that allowing its com­ments into the record of this case at this time, given that there has been no Commission action taken, will prejudice any party and will not burden or disrupt the development of the case.

The PUCO, therefore, respectfully requests this Commission accept the attached Comments.

Respectfully submitted,

*/s/ Thomas W. McNamee*

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**Attorney for the**

**Public Utilities Commission of Ohio**

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# CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. Section 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

*/s/ Thomas W. McNamee*

**Thomas W. McNamee**

Dated at Columbus, Ohio this April 11, 2016.