

Exhibit DWG-2: Responses to Selected Data Requests

Nucor Set 01

Answer Prepared By: Edward B. Stein, Brandon S. McMillen and Edward C. Miller
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO
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

ANSWERS TO INTERROGATORIES

Nucor Set 01 – INT-004 Regarding the Companies’ proposal to no longer serve as the CSP for Rider ELR customers:

- (a) Aside from customer notifications, penalties, or testing requirements as referred to at page 5, lines 20-21 of Witness Stein’s testimony, what other activities do the Companies perform in serving as the CSP for Rider ELR customers?
- (b) How long have the Companies been serving as the CSP for Rider ELR customers?
- (c) Explain in detail any problems that the Companies have encountered in serving as the CSP for Rider ELR customers.
- (d) Identify any costs the Companies incur in serving as the CSP for Rider ELR customers.
- (e) Identify the number of employees used and the number of manhours spent by the Companies in serving as the CSP for Rider ELR customers.
- (f) Could the Companies continue to serve as the CSP for Rider ELR customers if the Commission directs them to do so? If not, please explain why in detail.
- (g) Aside from Rider ELR load, have the Companies offered any other demand response or energy efficiency resources into the PJM markets and/or served as the CSP for any other customers? If so, please explain in detail.
- (h) Do the Companies intend to offer any energy efficiency and/or demand responses resources into the PJM markets during the proposed term of ESP V? If so, please explain in detail.
- (i) Did the Companies consult with their current Rider ELR customers concerning the requirement that Rider ELR customers participate in the PJM load management programs through their own CSP? If so, please describe how they were consulted and provide any input provided and any related documents.

Response: a. The companies also determine the amount of curtailable load to offer into RPM auctions and set the price strategy of how to offer those assets into the

RPM auctions. The Companies must then monitor PJM emergency operations notifications in order to curtail customers when required.

- b. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies interpret this Request as seeking information regarding when the Companies began serving as the CSP for all Rider ELR customers, and not requesting information regarding any specific customer's service dates. The Companies began managing the load of customers participating in Rider ELR beginning with the inception of Rider ELR on June 1, 2009.
- c. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. This Request is vague and ambiguous in its use of the term "problems." The Companies object to this Request that purports to require a detailed, narrative response. *Penn Central Transp. Co. v. Armco Steel Corp.*, 27 Ohio Misc. 76, 77 (C.P. 1971). The Request is overbroad and unduly burdensome in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, there have been metering, dispatch, and customer performance issues. For example, the Companies experienced a malfunction of the automated notification system for a recent PJM emergency event causing response to the event to be delayed.
- d. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Request is overbroad and unduly burdensome in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, from June 2016 – May 2023, the Companies have incurred costs totaling \$1,642,465 related to charges from PJM and costs associated with the Companies' notification system for Emergency Curtailment Events. These costs are recovered through Rider DSE1.
- e. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Request is overbroad and unduly burdensome in requesting identification of the "number of manhours spent by the Companies in serving as the CSP for Rider ELR customers" and in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, the Companies do not track the number of employees or personnel hours spent on serving as the CSP for Rider ELR customers. The groups within the Companies that are involved in serving as the CSP for Rider ELR customers include, but are not limited to, Rates and Regulatory Affairs, Legal, Energy Efficiency, Dispatch, Settlements, Customer Support, Accounting, Billing, Customer Service, and Supply Chain.

- f. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, the request calls for speculation. Subject to and without waiving the foregoing objections, yes.
- g. Objection. This Request is vague and ambiguous in its use of the phrase “offered any other demand response or energy efficiency resources into the PJM markets.” Subject to and without waiving the foregoing objections, yes, the Companies historically offered qualifying energy efficiency resources associated with programs implemented under Ohio Revised Code Section 4928.66 into the PJM capacity markets. Because those programs have ended and the associated resources no longer qualify for participation, that effort has been discontinued. The Companies have not served as CSP for any other customers.
- h. Objection. This Request is vague and ambiguous in its use of the phrase “offered any other demand response or energy efficiency resources into the PJM markets.” Subject to and without waiving the foregoing objections, yes, assuming the energy efficiency programs proposed as part of ESP V are approved as filed. Please see the Testimony of Edward Miller at p. 29 for a detailed explanation.
- i. Objection. This Request is vague and ambiguous in its use of the term “consult” and the phrase “the requirement that Rider ELR customers participate in the PJM load management programs through their own CSP.” The Companies interpret this request to seek information regarding the Companies’ communications to current ELR customers regarding the Companies’ Rider ELR proposal in ESP V. Subject to and without waiving the foregoing objections, yes. In ESP V pre-filing meetings with interested stakeholders, the Companies solicited feedback on Rider ELR and presented their plans for Rider ELR in ESP V. Separate from these ESP V discussions, the Companies have also consulted with current Rider ELR customers about participating in PJM load management programs through their own CSP beyond the expiration of ESP IV, and in connection with a customer’s intent to participate in the PJM Synchronized Reserve Market..

Nucor Set 01
Answer Prepared By: Edward B. Stein
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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ANSWERS TO INTERROGATORIES

Nucor Set 01 – INT-005 Provide any studies, analyses, reports, or other documents used by the Companies in developing the proposed changes to Rider ELR discussed at pages 4 through 7 of Witness Stein’s testimony.

Response: Objection. This Request is vague and ambiguous in its use of the term “used.” Objecting further, this Request improperly seeks or purports to require the Companies to provide documents and/or information that is publicly available or already in the possession, custody, or control of the requesting party, and thus equally available to the requesting party. Subject to and without waiving the foregoing objections, the Companies did not prepare studies, analyses, reports, or other documents. The Companies did rely in part on publicly available information including: PJM OATT and Operating Agreement, the Companies’ current Rider ELR tariff, and PJM Stakeholder meeting documentation.

Nucor Set 01
Answer Prepared By: Brandon McMillen
As to Objections: Trevor Alexander

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ANSWERS TO INTERROGATORIES

Nucor Set 01 – INT-006 Provide any studies, analyses, reports, or other documents used by the Companies in developing the proposed changes to Rider ELR discussed at pages 11 through 15 of Witness McMillen’s testimony.

Response: Objection. This Request is vague and ambiguous in its use of the term “used”. Subject to and without waiving the foregoing objections, see the Companies’ responses to PUCO DR-006, Nucor Set 01-INT-003, and Nucor Set 01-INT-005. The Companies also conducted ESP V pre-filing meetings with interested stakeholders, where they solicited feedback on Rider ELR and presented their plans for Rider ELR in ESP V. in addition, the Companies reviewed AEP’s Electric Security Plan filing in Case No. filed in 23-23-EL-SSO and the testimony filed by Jaime L. Mayhan regarding AEP’s proposed changes to their Interruptible Power tariffs.

Nucor Set 01
Answer Prepared By: Juliette Lawless
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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ANSWERS TO INTERROGATORIES

Nucor Set 01 – INT-007 For a customer currently participating in the NMB Pilot Program, please explain any differences between how transmission costs are to be allocated and recovered under the Companies’ proposed NMB 2 charge and how such costs are currently allocated and recovered under the Pilot Program.

Response: Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Companies object to this Request that purports to require a detailed, narrative response. Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (C.P. 1971). Subject to and without waiving the foregoing objections, for customers participating in the Rider NMB Pilot Program and shopping with a supplier, the allocation and recovery of applicable costs are determined by the participating customer’s supplier, so the Companies do not know. For customers participating in the Rider NMB Pilot Program and being manually billed for their non-market-based services charges by the Companies, the customers are charged as described in Witness Lawless’s testimony at page 9, line 15 through page 10, line 3.

Under the Companies’ Rider NMB proposal in this case, non-market-based services costs for all customers will continue to be allocated to the Companies’ rate schedules based on the four coincident system peaks (“4 CPs”) from the prior year. The resulting aggregate allocated revenue requirement for all commercial and industrial customers on Rate Schedules GS, GP, GSU, and GT is divided by the aggregate NSPLs for those same customers to derive the NMB 2 rates. See the direct testimony of Companies’ Witness Lawless at page 7, line 21 through page 8, line 8, and page 11, lines 1-14. The proposed NMB 2 rates charge all applicable billing line items based upon the customer’s NSPLs; there is not a breakout for kWh-based charges.

OCC Set 5
Answer Prepared By: Brandon McMillen
As to Objections: Trevor Alexander

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ANSWERS TO INTERROGATORIES

OCC Set 05 – INT-006 The following interrogatories relate to the Economic Load Response Rider (“Rider ELR”).

- (a) For the current calendar year and the past two calendar years, how many customers participate on the Economic Load Response Rider for each operating company (OE, CEI, & TE)?
- (b) What is the total curtailable load in kW for each operating company under Rider ELF for the current calendar year and the past two calendar years?
- (c) Are customers in the Rider ELR program also allowed to participate in the PJM Demand Response Program?
- (d) If Rider ELR customers are allowed to participate in the PJM Demand Response Program, are customers allowed to keep any credits received from PJM or are they required to reimburse FE?
- (e) For each of the past five years (201, 2019, 2020, 2021 and 2022) and to date in 2023, how many Emergency Curtailable Events occurred under Rider ELR?
- (f) What was the duration of each curtailable event?
- (g) How much load was actually curtailed for each Emergency Curtailable Event for OE, CEL and TE?

Response: (a) 16 OE customers; 4 CEI customers; and 4 TE customers.

- (b) Objection. This request is vague and ambiguous in its use of the terms “Rider ELF” and “curtailable load.” For purposes of this response the Companies assume “Rider ELF” means “Rider ELR” and that “curtailable load” is defined as provided in the Companies’ Rider ELR tariffs. Subject to and without waiving the forgoing objections, see the table below for the sum of the total monthly curtailable loads in kW.

OPCO	2021	2022	2023 thru June
CEI	2,253,583	2,283,740	1,101,362
OE	2,019,121	2,097,305	1,024,888
TE	2,247,310	2,240,958	1,120,123

- (c) Objection. The request is vague and ambiguous in its use of the phrase “PJM Demand Response Program”. For purposes of this response, the Companies interpret this request to ask whether Rider ELR customers can participate with their demand response capabilities in the PJM capacity market. Subject to and without waiving the foregoing objections, the Rider ELR tariff provides that Rider ELR customers are not able to participate with their demand response capabilities in the PJM capacity market, . However, Rider ELR customers are able to participate in PJM programs related to the energy market.
- (d) Rider ELR customers that participate in PJM programs related to the energy market do not reimburse the Companies for credits they may receive from those other programs.
- (e) Objection. This Request is vague and ambiguous in its use of the term “201.” For purposes of this response, the Companies assume this Request seeks the number of Emergency Curtailable Events, including test events, from 2018-present. Subject to and without waiving the foregoing objections, see the table below.

Date	Start Time	End Time
May 14, 2019 (PJM Test)	2:00 PM	3:00 PM
May 11, 2021 (PJM Test)	2:00 PM	3:00 PM
May 10, 2022 (PJM Test)	2:00 PM	3:00 PM
December 24, 2022	10:10 AM	8:00 PM

- (f) See response to (e).
- (g) Objection. This Request is vague and ambiguous in its use of the terms “load was actually curtailed” and “CEL.” For purposes of this response, the Companies assume “CEL” means CEI. Subject to and without waiving the foregoing objections, for each event listed in (e), the Companies successfully curtailed to or below their PJM registered firm service level for all Rider ELR customers. See the table below for the expected load reduction for Rider ELR customers reported to PJM for each delivery year coinciding with the events listed in (e).

Delivery Year	MWs
2018/19	126.8
2020/21	132.8
2021/22	128.6
2022/23	199.5

OELC Set 01
Answer Prepared By: Juliette Lawless, Christopher Moravec, Ronald Lord
As to Objections: Trevor Alexander

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-001 For each year during the term of FirstEnergy’s ESP IV through the present year, please identify:

- a) The total number of customers and total number of accounts enrolled in FirstEnergy’s Rider NMB Pilot in each year;
- b) For each account enrolled in FirstEnergy’s Rider NMB Pilot at any time during the term of FirstEnergy’s ESP IV, that account’s Network Service Peak Load (“NSPL”) value for each year that the account was enrolled in the Rider NMB Pilot;
- c) For each account enrolled in FirstEnergy’s Rider NMB Pilot at any time during the term of FirstEnergy’s ESP IV, that account’s monthly billed demand for each month in each year that the account was enrolled in the Rider NMB Pilot; and
- d) An indication of which accounts enrolled in FirstEnergy’s Rider NMB Pilot at any time during the term of FirstEnergy’s ESP IV were enrolled through a reasonable arrangement approved by the PUCO.

Response: a)

Year	Customers	Accounts	Premise Numbers
2016	41	44	44
2017	41	59	63
2018	53	73	77
2019	56	78	82
2020	61	85	89
2021	75	105	108
2022	77	109	112
2023	71	97	99

*This table include participants at the end of the NMB year; 2023 includes participants as of October 2023

- b) See OELC Set 01-INT-001 Attachment 1 Confidential.

- c) Objection. The Request is overbroad and unduly burdensome in requesting monthly billed demand for each month in each year for each account enrolled in First Energy's Rider NMB Pilot at any time during the Companies' ESP IV. Subject to and without waiving the foregoing objection, see OELC Set 01-INT-001 Attachment 1 Confidential for the monthly demands for each Pilot participant while participating in the Pilot program for March 2019 through July 2023.

- d) Objection. This Request is vague and ambiguous in its use of the phrase "An indication of which accounts enrolled in FirstEnergy's Rider NMB Pilot." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. This Request improperly seeks or purports to require the Companies to provide information that is publicly available on the Commission's docket and thus equally available to the requesting party. Subject to and without waiving the foregoing objections, please see OELC Set 01-INT-001 Attachment 1 Confidential.

OELC Set 01
Answer Prepared By: Juliette Lawless

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-006 For the proposed NMB 2 rate, will FirstEnergy use the actual NSPL values assigned to the account to bill NMB 2 charges, or will FirstEnergy use some other value? If some other value, please describe the calculation of that value.

Response: The Companies will use actual NSPL values assigned to the customer's account to bill Rider NMB 2 rates.

OELC Set 01
Answer Prepared By: Juliette Lawless

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-007 For the proposed NMB 2 rate, for those commercial and industrial customers in NMB 2, will NMB 2 rate charges be static on a month-to-month basis, only changing when the account at issue is assigned a new NSPL value on January 1 of any given year or when the NMB 2 rate is updated by FirstEnergy through its annual update filings referred to in the testimony of Juliette Lawless filed in this Proceeding at p. 11, lines 15-20? If not, please describe what other factors will lead to variations in the NMB 2 rate over the course of a calendar year.

Response: Yes, Rider NMB 2 charges for an individual customer will remain the same each month until either the customer is assigned a new NSPL value or the Rider NMB 2 rate is updated.

OELC Set 01
Answer Prepared By: Brandon McMillen
As to Objections: Trevor Alexander

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-013 Please identify the total load in MW that was curtailed or interrupted in FirstEnergy territory on December 24, 2022, as a result of any interruptible notice originating from PJM (including, but not limited to, any Pre-Emergency Load Management Reduction Action, Emergency Load Management Reduction Action or NERC level EEA2 initiated or issued by PJM at any time on December 24, 2022).¹

Response: Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies only have information regarding load curtailed or interrupted as a result of PJM notices as it relates to Rider ELR customers. See the Companies' response to OCC Set 05-INT-006(g).

¹ Please refer to this publicly-available PJM presentation if further details are required on the terms used in this interrogatory: <https://www.pjm.com/-/media/committees-groups/committees/mic/2023/20230111/item-0x---winter-storm-elliott-overview.ashx>

OELC Set 01
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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-014 For the load identified in response to ROG-01-013, please identify:

- a) the total number of FirstEnergy accounts included in that curtailed or interrupted load;
- b) for the accounts included in the response to subpart (a) of this interrogatory, the total number of those accounts that were participating or being served under FirstEnergy’s Rider ELR on December 24, 2022;
- c) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the total load in MW that was curtailed or interrupted at any time on December 24, 2022;
- d) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the cumulative total number of hours that those accounts were curtailed or interrupted at any time on December 24, 2022;
- e) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the peak load contribution (PLC) values for each account for the current 2022/2023 delivery year and future 2023/2024 delivery year;
- f) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the monthly billed demand for each account for the 12 billing cycles with service periods ending in June 2022 through May 2023; and
- g) a detailed itemization of all payments, revenues and/or penalties received by FirstEnergy from PJM related to the load curtailment on December 24, 2022, or the interruptible notice originating from PJM on that date.

Response: Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections:

- a) 24 ELR customers were curtailed.

- b) See the Companies’ response to subpart (a).
- c) See the Companies’ response to OCC Set 05-INT-006(g).
- d) See the Companies’ response to OCC Set 05-INT-006(e).
- e) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, see OELC Set 01-INT-014 Attachment 1 Confidential.
- f) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, see OELC Set 01-INT-014 Attachment 2 Confidential.
- g) Objection. This Request is vague and ambiguous in its use of the phrase “or the interruptible notice originating from PJM on that date.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies received approximately \$11.4M in payments from PJM for the curtailment events in December 2022.

OECS	P
3/1/2023 0:00	\$ (2,151,718.16)
4/1/2023 0:00	\$ (2,944,130.26)
5/1/2023 0:00	\$ (2,721,728.86)
6/1/2023 0:00	\$ (1,405,837.57)
7/1/2023 0:00	\$ (1,086,346.53)
8/1/2023 0:00	\$ (1,132,623.12)
	\$ (11,442,384.50)

OELC Set 01
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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-015 Please identify the number of FirstEnergy accounts that were participating or being served under FirstEnergy’s Rider ELR on December 23, 2022, that failed to curtail or interrupt load on that day in response to any interruptible notice originating from PJM or FirstEnergy, and for those accounts identify the total aggregate amount of load in MW that should have been curtailed or interrupted on that day.

Response: None. See the Companies’ response to OELC Set 01-INT-021.

OELC Set 01
Answer Prepared By: Brandon McMillen

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-016 Please identify the number of FirstEnergy accounts that were participating or being served under FirstEnergy’s Rider ELR on December 24, 2022, that failed to curtail or interrupt load on that day in response to any interruptible notice originating from PJM or FirstEnergy, and for those accounts identify the total aggregate amount of load in MW that should have been curtailed or interrupted on that day.

Response: None.

OELC Set 01
Answer Prepared By: Edward B. Stein

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-021 In response to Subpart (c) of Interrogatory No. 4 of the first set of discovery requests from Nucor Steel Marion, Inc. (“Nucor”) (Nucor Set 01 – INT-004), FirstEnergy stated that, “there have been metering, dispatch, and customer performance issues. For example, the Companies experienced a malfunction of the automated notification system for a recent PJM emergency event causing response to the event to be delayed.” With respect to this “malfunction” referenced by FirstEnergy, please provide the following information:

- a) identify when the malfunction occurred;
- b) identify what caused the malfunction;
- c) describe specifically what the malfunction was;
- d) describe specifically what delay occurred as a result of the malfunction;
- e) identify how long of a delay was caused by the malfunction;
- f) identify the specific amount of any penalties assessed by PJM as a result of this delay in response described by FirstEnergy; and
- g) if there were PJM penalties, identify whether FirstEnergy has sought to recover any portion of those penalties from its customers.

Response:

- a) The malfunction occurred on December 23, 2023, and December 24, 2023.
- b) The Companies have a notification system in place that automatically polls the PJM DR Hub for emergency curtailment events. Once an event is called by PJM, the Companies’ system will be triggered, and notifications would be sent to the customers called by PJM through a webservice. When the events in December were triggered, the webservice returned an error and did not send the notifications. This was due to API integration with the webservice. Once the error was discovered, the Companies sent out notifications manually.
- c) See the Companies’ response to b).
- d) On December 23, 2023, PJM triggered events for 5 ELR customers at 5:30PM and 6:00PM and ended the events at 10:15 PM. On December 24, 2023, PJM triggered events at 4:20AM, 5:00AM and 6:30AM for all ELR customers.

After identifying the malfunction of the notification system and confirming the customers that were called to curtail, the Companies began to send out event notices at 9:30AM on December 24, 2023.

- e) See the Companies' response to d).
- f) Due to the Companies' ELR customers overperformance in the event hours, the Companies did not receive any penalties. See also the Companies' response to OELC Set 01-INT-014.
- g) Not applicable.

OELC Set 01
Answer Prepared By: Brandon McMillen

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-023 Referring to page 14, lines 3-5, of the testimony of Brandon McMillen filed in this Proceeding on April 5, 2023, where Mr. McMillen testified that “Currently, the Companies are eligible to receive revenues from PJM if the Rider ELR demand response resources clear in the PJM capacity auctions, and 80% of those revenues are provided to customers to offset the costs of the Rider ELR and Rider EDR(b) credits”, please provide the following information:

- a) describe why FirstEnergy keeps 20% of the PJM revenues associated with Rider ELR demand response resources that clear in the PJM capacity auctions;
- b) describe what services FirstEnergy provides, if any, to justify the retention of 20% of the PJM revenues associated with Rider ELR demand response resources that clear in the PJM capacity auctions;
- c) identify the PUCO order or tariff provision that permits FirstEnergy to retain 20% of the PJM revenues associated with Rider ELR demand response resources that clear in the PJM capacity auctions; and
- d) describe whether FirstEnergy retains any other PJM revenues associated with Rider ELR demand response resources, including, but not limited to, emergency energy payments made by PJM for demand response events.

Response:

- a) See the July 17, 2013 Entry on Rehearing in Case No. 12-2190-EL-POR (paragraph 8) and the November 21, 2017 Opinion and Order in Case No. 16-0743-EL-POR (paragraphs 34 and 74).
- b) See the Companies’ response to part a).
- c) See the Companies’ response to part a).
- d) The Companies retain 20% of all PJM revenues associated with energy efficiency and demand response programs, including but not limited to emergency payments made by PJM for demand response events, pursuant to the response to part a).

OELC Set 01
Answer Prepared By: Edward Miller

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ANSWERS TO INTERROGATORIES

OELC Set 01– INT-025 Referring to page 30, lines 9-13, of the testimony of Edward Miller filed in this Proceeding on April 5, 2023, where Mr. Miller testified that “The Companies propose to utilize the previously approved Commission practice in which 80% of PJM net revenues obtained from cleared EE resources (revenues minus costs) from the FCM would offset the EE/PDR Plan revenue requirements in the years the PJM FCM revenues are realized, with 20% of the PJM FCM revenues retained by the Companies”, please provide the following information:

- a) describe why FirstEnergy is proposing to keep 20% of the PJM net revenues described by Mr. Miller;
- b) describe what services FirstEnergy will provide, if any, to justify the retention of 20% of the PJM net revenues described by Mr. Miller; and
- c) identify all PUCO orders or tariffs reflecting the “previously approved Commission practice” referred to by Mr. Miller.

Response:

- a) The Companies propose to continue the 80/20 percent sharing of revenues between customers and the Companies, consistent with the July 17, 2013 Entry on Rehearing in Case No. 12-2190-EL-POR (paragraph 8) and the November 21, 2017 Opinion and Order in Case No. 16-0743-EL-POR (paragraphs 34 and 74). .
- b) The Companies will perform analysis and develop offers for eligible EE Resources from programs into applicable PJM Base Residual Auctions (“BRAs”) and/or Incremental Auctions (“IAs”). The Companies intend to offer in EE peak reduction values from programs consistent with PJM’s governing Manuals 18 and 18B. The Companies plan the following high-level processes for use in the development of its EE resource values to facilitate participation in the PJM Capacity Auctions:
 - a. Identify and remove PJM ineligible measures and establish Capacity Rights to the EE resources to be considered.
 - b. Categorize PJM eligible measures by PJM Program name and segregate EE resources into the applicable PJM delivery year.
 - c. Determine the kW savings values for each measure for the PJM

defined summer and winter periods, based on assigned savings load shape, accounting for delivery channel, interactive factors and fuel.

- d. Aggregate kW savings based on PJM Capacity performance kW values being the lesser of the summer or winter kW values by installation period, to maximize offers and allow for otherwise stranded resources to participate.
- e. Recognize costs to participate vs anticipated revenues for selection of EE resources to be offered.
- f. Recognize that EE resources have a limited offer duration of four years with additional installation period limitations.
- g. Recognize that PJM Auctions have been delayed and some IA auctions cancelled, resulting in the potential for EE resources from some installation periods no longer being eligible for inclusion in auctions.

c) See the response to subpart a)

OEG Set 01-DR-004
Answer Prepared By: Brandon S. McMillen

Case No. 23-0301-EL-SSO

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

RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS

OEG Set 01-DR-004 For calendar years 2020, 2021, and 2022 identify the number of customers receiving service under the current Economic Load Response Program Rider (“Rider ELR”).

Response: 24 customers.

OEG Set 01-DR-005
Answer Prepared By: Brandon S. McMillen
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

OEG Set 01-DR-005 For calendar years 2020, 2021, and 2022 identify the megawatts of interruptible load receiving service under the current Rider ELR.

Response: Objection. The request is vague and ambiguous in its use of the phrase “interruptible load”. Subject to and without waiving the foregoing objections, and assuming “interruptible load” refers to “curtailable load” as defined in the Rider ELR tariffs, see the Companies’ response to OCC Set 05-INT-006(b).

OEG Set 01-DR-006
Answer Prepared By: Brandon S. McMillen
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

OEG Set 01-DR-006 For calendar years 2020, 2021, and 2022 identify the number of interruptions and the duration of interruptions for customers receiving service under the current Rider ELR.

Response: Objection. The Request is overbroad and unduly burdensome in requesting the duration of each and every interruption for every customer receiving service under the current Rider ELR. The request is also vague and ambiguous in its use of the term “interruptions.” The Companies interpret this request as seeking information regarding the number of Emergency Curtailable Events, including test events, as defined in the Rider ELR tariffs, as well as the duration of each such event. Subject to and without waiving the foregoing objections, see the Companies’ response to OCC Set 05-INT-006(e).

OEG Set 01-DR-007
Answer Prepared By: Juliette Lawless
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO
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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

- OEG Set 01-DR-007** Please provide, in Excel, a workpaper supporting the most recently developed allocation of ATSI network integrated transmission costs to each ATSI wholesale customer, including FE (as an LSE), municipals, cooperatives, etc. Please show the following:
- a. The date and time of the ATSI NSPL.
 - b. Each wholesale customer's NSPL.
 - c. The name and state of the wholesale customer.
 - d. Date and time of each of the 4 CPs used in the calculation of the Customer NSPL based on 5CPs.

Response: Objection. This request is vague and ambiguous in its use of the term "FE." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Request is overbroad and unduly burdensome in requesting information regarding the allocation to each ATSI wholesale customer. This Request seeks information in the possession of ATSI rather than information in the possession of the Companies. In addition, this request seeks confidential ATSI wholesale customer information. Subject to and without waiving the foregoing objections:

- a. June 15, 2022, hour ending 1600 EPT.
- b. Please see the table below for a breakdown of the NSPL in the ATSI zone:

CE	3,928.5	MW
OE	4,776.7	MW
TE	1,994.1	MW
OH Wholesale	922.2	MW
Penn Power	894.3	MW
Other *	255.3	MW
Total	12,771.1	MW

*Reflects the difference between the total, calculated NSPL and the ATSI zonal target, including NSPLs corresponding with customer move-in dates after the highest peak loads occurred in 2022, and the scaling factor assigned by PJM to tie the aggregate NSPL to ATSI's zonal target.

- c. Please see the Companies' response to subpart b.
- d. The ATSI summer peak hours were as follows: 6/15/2022 hour ending 1500, 7/20/2022 hour ending 1500, 8/3/2022 hour ending 1900, and 9/2/2022 hour ending 1700.

OEG Set 01-DR-008
Answer Prepared By: Edward B. Stein
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

OEG Set 01-DR-008 Please explain how the FE LSE NITS costs are allocated to each FE OPCo (OE, TE, CE). In particular state whether the OPCo allocation is based on the OPCo's 1 CP NSPL or the summation of the OPCo's 5 CP customer NSPLs for its customers. Also state whether the OPCo allocation includes the load of the OPCo's Pilot customers.

Response: Objection. This Request is vague and ambiguous in its use of the term "OPCo's Pilot customers." The Companies interpret this request as seeking information regarding the current Rider NMB Pilot program. Subject to and without waiving the foregoing objections:

NITS costs are allocated to each FE Ohio operating company (OE, CE, TE) by summing the NSPLs of all customers operating under that operating company multiplied by the NITS rate of the ATSI Zone.

With respect to the basis of the OPCO allocation, the assignment of NSPLs to individual customers follows the 5 CP method described in the Companies' capacity manual titled "Determination of Capacity Peak Load Contributions and Network Service Peak Loads," which is available at: [PJMCapacityManualOH.pdf \(firstenergycorp.com\)](#).

Regarding whether the OPCo allocation includes the load of the NMB Pilot customers, the OpCo allocations always include the Pilot customers' NSPLs.

OEG Set 01-DR-009
Answer Prepared By: Juliette Lawless

Case No. 23-0301-EL-SSO

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

RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS

OEG Set 01-DR-009 Please confirm that each customer in classes GS, GP, GSU and GT has a Customer NSPL which represents their allocated share of the FE NSPL.

Response: The Companies confirm that each customer on rate schedules GS, GP, GSU and GT has a customer NSPL that represents their individual contribution to the system-wide aggregate NSPL.

OEG Set 01-DR-012
Answer Prepared By: Juliette Lawless
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

OEG Set 01-DR-012 Please confirm that, to the best of the Company's understanding of the Exeter Audit Report, the Exeter analysis did not include any potential savings to ATSI revenue requirements due to a reduction in the RTEP and PJM administrative charges that were made possible by Pilot customer load reductions. If the Company is unable to confirm or deny, please explain why.

Response: Objection. This Request is vague and ambiguous in its use of the phrases "Exeter Audit Report" and "any potential savings to ATSI revenue requirements due to a reduction in the RTEP and PJM administrative charges that were made possible by Pilot customer load reductions." The Companies assume "Exeter Audit Report" means the Exeter Audit Report filed on 7/17/2023 in Case No. 22-0391-EL-RDR. However, it is not clear to the Companies what "potential savings" the request is referencing. Subject to and without waiving the foregoing objection, the Companies cannot provide the requested confirmation. The Exeter Audit Report does identify estimated savings from the Rider NMB Pilot. See page 3 of the Exeter Audit Report: "[...], the Pilot provided approximately \$8.9 million in total benefit over the 7-year assessment period, or approximately \$1.3 million per year."

OEG Set 01-DR-013
Answer Prepared By: Ed Stein
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE OHIO ENERGY GROUP'S
DATA REQUESTS**

OEG Set 01-DR-013 Please identify each PJM allocated charge to ATSI that would potentially be reduced if Pilot customers reduced their NSPLs.

Response: Objection. This Request is vague and ambiguous in its use of the terms “reduced” and “Pilot.” The Companies interpret this request as seeking information regarding the current Rider NMB Pilot program. This Request also seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the charges at PJM that utilize NSPL as a billing determinant include NITS, TEC, TEC Settlement, Reactive, Black Start and Non-Firm Credits.

PUCO DR-006

Case No. 23-0301-EL-SSO

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

**RESPONSES TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUESTS**

- PUCO
DR-006**
1. Regarding the Economic Load Reduction (ELR) program:
 - a. For each year since the start of ESP IV, what is the total amount of credits paid to ELR participants (including credits under Rider EDR and Rider DSE)?
 - b. What is the total curtailable load for current ELR participants?
 - c. Identify all current ELR participants.
 - d. State the curtailable load for each current ELR participant.
 - e. For each year since the start of ESP IV, identify all ELR participants and the amount of annual credits received by each participant (under each of Rider EDR and Rider DSE).
 - f. For each current ELR participant, to the extent known by the Companies, state whether the participant is a member of Ohio Energy Group, Ohio Energy Leadership Council (formerly Industrial Energy Users-Ohio), Ohio Manufacturers' Association, or none of the above.
 - g. Since the beginning of ESP IV, how many times have the Companies called on ELR participants to interrupt each year?
 - h. Page 6 of the Testimony of Edward Stein states: "To date, the Companies have not called a load interruption event on their distribution system independent of PJM under the provisions of Rider ELR during the term of ESP IV."
 - i. Did the Companies call any load interruption events on their distribution system independent of PJM under the provisions of Rider ELR prior to the start of ESP IV?
 - ii. If so, how many times, under what circumstances, and on what dates?
 - i. Page 14 of the Testimony of Brandon McMillen states: "Over the term of ESP IV, average annual PJM revenue offsets for Rider ELR resources credited to customers were approximately \$2 million." Please provide the exact amount of credits for each year of ESP IV.

- Response:**
- a. See PUCO DR-006 Attachment 1.
 - b. See PUCO DR-006 Attachment 2 Confidential.
 - c. See PUCO DR-006 Attachment 2 Confidential.
 - d. See PUCO DR-006 Attachment 2 Confidential.

- e. See PUCO DR-006 Attachment 2 Confidential for the credits ELR customers received through Riders ELR and EDR(b) for the period February 2019 through May 2023. The Companies are working on locating information prior to February 2019..
- f. The Companies’ latest records of the membership of Rider ELR customers in the referenced customer groups are provided in PUCO DR-006 Attachment 2 Confidential. Membership may change without notification to the Companies.
- g. See the following table:

June 16 - May 17*	June 17 - May 18*	June 18 - May 19*	June 19 - May 20**	June 20 - May 21*	June 21 - May 22*	June 22 - May 23
1	1	1	0	1	1	1

* PJM Test Event

**For PJM year 2019/2020, the Companies received waivers of the Rider ELR testing requirements due to COVID-19 implications. See Case No. 20-1025-EL-WVR

- h.
 - i. Yes
 - ii.

1/19/1994
6/25/1998
6/26/1998
8/15/2003
8/20/2003
8/21/2003
8/1/2006
8/2/2006
7/22/2011

- i. See the following table for the 80% of the PJM revenues received by the Companies that were credited to customers in Rider DSE1, pursuant to the PUCO Entry on Rehearing dated July 17, 2013 in Case No. 12-2190-EL-POR, and continued pursuant to the PUCO Order dated November 21, 2017 in Case No. 16-743-EL-POR:

June 16 - May 17	June 17 - May 18	June 18 - May 19	June 19 - May 20	June 20 - May 21	June 21 - May 22	June 22 - May 23
\$ 75,251	\$ 1,969,546	\$ 1,365,170	\$ 3,557,180	\$ 2,066,337	\$ 3,091,897	\$ 5,324,066