BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company’s Compliance with R.C. 4928.17 and the Ohio Adm. Code Chapter 4901:1-37. | )))))) | Case No. 17-974-EL-UNC |

**JOINT DISCOVERY STATUS REPORT**

**BY**

**OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

**NORTHEAST OHIO PUBLIC ENERGY COUNCIL**

**AND OHIO MANUFACTURERS’ ASSOCIATION ENERGY GROUP**

Per ¶ 30 of the Attorney Examiners’ April 7, 2022 Entry and ¶ 28 of the June 16, 2022 Entry, the Office of the Ohio Consumers’ Counsel (“OCC”), the Northeast Ohio Public Energy Council (“NOPEC”) and the Ohio Manufacturers’ Association Energy Group (“OMAEG”) (collectively, the “Consumer Parties”) respectfully file this amended discovery status update. The Consumer Parties incorporate the information provided in their June 13, 2022 and June 22, 2022 Joint Discovery Status reports, and provide the following additional information in response to the Attorney Examiners’ April 7, 2022 and June 16, 2022 Entries regarding the number of documents that the Consumer Parties have collectively reviewed.

# I. Document Review

Table 1: Estimated Documents Produced by FirstEnergy Corp.

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| --- | --- | --- |
| Produced | Initial Review Completed | Awaiting Initial Review |
| 472,000 pages | Approx. 270,000 pages | Approx. 102,000 pages |

Table 2: Estimated Documents Produced by FirstEnergy Utilities

|  |  |  |
| --- | --- | --- |
| Produced | Initial Review Completed | Awaiting Initial Review |
| 40,000 pages | Approx. 26,000 pages | Approx. 14,000 pages |

The FirstEnergy Utilities previously produced documents relating to the FERC audit of FirstEnergy Corp., but only through the date of the February 4, 2022 audit report. The FirstEnergy Utilities recently agreed to produce documents related to the FERC audit report that were created after February 4, 2022. The Consumer Parties expect to receive the first batch of these additional documents from the FirstEnergy Utilities relating to the FERC audit by July 11, 2022, with additional documents to be produced on a rolling basis thereafter.

# II. Depositions

The Consumer Parties have tentatively scheduled the deposition of Ms. Ebony Yeboah-Amankwah for July 21, 2022. We have yet to schedule the deposition of Mr. Jason Lisowski.

# III. Procedural Schedule

On June 22, 2022, the Consumer Parties filed a motion to extend the procedural schedule in light of the large volume of documents yet to be reviewed, and the new documents anticipated to be received in recent weeks. The Companies took “no position” on the Consumer Parties’ Motion. FirstEnergy Corp. did not file a responsive pleading. There has been no ruling on that Motion.

Respectfully submitted,

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| */s/ Dane Stinson* Dane Stinson (0019101)**Bricker & Eckler LLP**100 South Third StreetColumbus, Ohio 43215Telephone: (614) 227-2300dstinson@bricker.com(willing to accept service by email)Glenn S. Krassen (0007610)General Counsel**Northeast Ohio Public Energy Council** 31360 Solon Road, Suite 33 Solon, Ohio 44139 Telephone: (440) 249-7831 gkrassen@nopec.org(willing to accept service by e-mail)*Counsel for Northeast Ohio Public* *Energy Council**/s/ Kimberly W. Bojko*Kimberly W. Bojko (0069402)Counsel of RecordJonathan Wygonski (100060) **Carpenter Lipps & Leland LLP**280 North High Street, Suite 1300Columbus, Ohio 43215Telephone: (614) 365-4124bojio@carpenterlipps.comwygonski@carpenterlipps.com(willing to accept service by email)*Counsel for the Ohio Manufacturers’ Association Energy Group* | Bruce Weston (0016973)Ohio Consumers’ Counsel */s/ Maureen R. Willis*Maureen R. Willis (0020847) Counsel of Record John Finnigan (0018689)Connor D. Semple (0101102)Assistant Consumers’ Counsel **Office of the Ohio Consumers’ Counsel**65 East State Street, Suite 700Columbus, Ohio 43215Telephone [Willis]: (614) 466-9567Telephone [Finnigan]: (614) 466-9585Telephone [Semple]: (614) 466-9565maureen.willis@occ.ohio.govjohn.finnigan@occ.ohio.govconnor.semple@occ.ohio.gov(willing to accept service by email)Brian M. Zets (0066544)**Isaac Wiles & Burkholder, LLC**Two Miranova Place, Suite 700Columbus, Ohio 43215Telephone: (614) 221-2121bzets@isaacwiles.com(willing to accept service by e-mail)*Counsel for Office of the Ohio Consumers’ Counsel* |
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Joint Discovery Status Report was served on the persons stated below viaelectric transmission this 11th day of July 2022.

*/s/ Maureen R. Willis*

Maureen R. Willis

Assistant Consumers’ Counsel

The PUCO’s e-filing system will electronically serve notice of the filing of this document on the following parties:

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