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May 5, 2009

Ms. Renee J. Jenkins
Director, Administration Department
Secretary to the Commission
Docketing Division
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

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Dear Ms. Jenkins:

*Re: Motion for an Extension of Time and Memorandum in Support
In the Matter of the Commission Workshop Regarding Smart Metering
Deployment
Case No. 07-646-EL-UNC*

Enclosed for filing, please find the original and seventeen (17) copies of the Motion for an Extension of Time and Memorandum in Support in the above Proceeding. Please file the enclosed Motion in the above-referenced docket, time-stamping the two extras and returning them to the undersigned in the enclosed envelope.

Thank you for your assistance in this matter. Please contact me if you have any questions concerning this matter.

Very truly yours,

*Kathy J. Kofch*kag
Enclosures

cc: Parties of Record

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**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

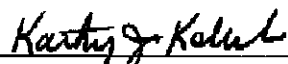
**In the Matter of the Commission-)
Ordered Workshop Regarding Smart)
Metering Deployment)**

Case No. 07-646-EL-UNC

**MOTION FOR AN EXTENSION OF TIME IN WHICH TO FILE STUDY
AND MEMORANDUM IN SUPPORT**

Pursuant to Rule 4901-1-12 of the Ohio Administrative Code, and for the reasons set forth in the attached memorandum in support, Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, "Companies") respectfully request an extension of the deadline by which they must file their AMI/Modem Grid Study from June 1, 2009 until August 14, 2009. Inasmuch as the original deadline is quickly approaching, the PE Companies further request that the Commission issue an entry no later than May 13, 2009.

Respectfully submitted,



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On behalf of Ohio Edison Company,
The Cleveland Electric Illuminating
Company and The Toledo Edison
Company

Memorandum in Support of Motion

I. Introduction

In its Opinion and Order in Case No. 07-551-EL-AIR, et al ("Rate Case Order"), the Commission directed Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, "Companies"):

to work with Staff to conduct a study of AMI/Modern Grid technology and deployment options at FirstEnergy ["Study"]. The Study should include an assessment of potential advanced smart metering technology investments, open system architecture planning, large-scale AMI deployment, other cost-effective modern/smart grid applications, and a cost/benefit analysis of such programs. The assessment and proposed deployment strategy shall be filed by June 1, 2009.... [Rate Case Order, p. 45.]

Because the Companies are part of an electric system that spans three states, the Companies must evaluate an AMI/Modern Grid project on a comprehensive basis, with a goal of developing one system that will integrate throughout the FirstEnergy footprint. Thus, many of the actions that the Companies have taken to date have been done throughout this footprint, rather than solely within Ohio, with the intent to apply the findings from the various studies performed in other states to the Companies' plans in Ohio.¹

The Companies met with members of the Commission's Staff on April 29, 2009 to provide them with a status update on the actions taken to date by the Companies in order to prepare (among other things) the requested Study, including without limitation, (i) the Companies' strategic plan (referred to internally as "the road map") that sets forth

¹ For example, a small scale smart grid project is being launched in New Jersey in conjunction with EPRI. And in Pennsylvania, a cost study was performed so as to determine the cost of upgrading/replacing one the Companies' sister company's distribution systems with Modern Grid technology.

an AMI/Modern Grid strategy should the decision be made to proceed; (ii) a summary of numerous projects that have been launched to study different aspects of AMI/Modern Grid technology; (iii) the open architecture/communication study that is in progress; and (iv) the large scale smart metering deployment plan that the Companies will be submitting for approval in Pennsylvania on August 14, 2009. The Companies also sought input from the Staff on other suggested areas of study.

Because many of the above-referenced activities are not yet complete, the Companies suggested that it may be beneficial to postpone the filing of the AMI/Modern Grid Study requested by the Commission until August 14th -- the date on which the Companies' Pennsylvania sister companies of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company will be filing their comprehensive smart metering implementation plan. The Staff indicated that it would not oppose such a request, given that many of the activities in progress should either be completed or much closer to completion by this date, thus providing the Companies with the opportunity to develop a more comprehensive report for the Commission's review.

II. Supporting Arguments

While the Companies are prepared to submit their Study to the Commission on June 1, 2009 as originally ordered, they believe that a more thorough study could be submitted if the filing deadline were extended to coincide with the filing of the smart meter implementation plan that will be filed in Pennsylvania on August 14, 2009. As part of the development of this statutorily mandated Pennsylvania plan, FirstEnergy is performing numerous studies, many of which lend themselves either in their entirety or in part to potential plans in Ohio. Moreover, the Companies are part of a comprehensive open architecture/communication study that should be relatively complete in time for the

August 14, 2009 filing, and preliminary results from several other studies, including a small scale smart grid project being performed in New Jersey in conjunction with EPRI should be available by this date as well. In the interim, the Companies have committed to meet with the Staff to provide more details on these and other on-going activities and to provide further updates over the next several months.

III. Conclusion

Based upon the foregoing, the Companies respectfully ask that the date by which they must submit their AMI/Modern Grid Study be extended from June 1, 2009 to August 14, 2009, so as to provide more details from studies and projects that are still in progress. Moreover, given that the original deadline is quickly approaching, the Companies further request that an entry on their motion be entered no later than May 13, 2009.

Respectfully submitted,



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On behalf of Ohio Edison Company,
The Cleveland Electric Illuminating
Company and The Toledo Edison
Company

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of a Motion for an Extension of Time in Which to File Study and the related Memorandum in Support of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company was served upon the parties included on the Commission's mailing list titled SMARTMETERING@LISTS.PUC.STATE.OH.US by electronic mail on this 5th day of May, 2009.

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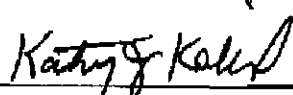
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