BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

OHIO EDISON COMPANY THE CLEVELAND ELECTRIC ILLUMINATING COMPANY AND THE TOLEDO EDISON COMPANY

ALTERNATIVE ENERGY RESOURCE PLAN 2011 THROUGH 2021

APRIL 15, 2011

CASE NO. 11-2491-EL-ACP

I. INTRODUCTION

Pursuant to Rule 4901:1-40-03(C) of the Ohio Administrative Code ("OAC"), Ohio Edison Company ("Ohio Edison"), The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company ("Toledo Edison") (collectively, the "Companies") file their Alternative Energy Resource Plan for compliance with future annual advanced and renewable energy resource benchmarks for the period January 1, 2011 through December 31, 2021 (the "Plan"). This Plan is speculative in nature and is subject to change as statutory requirements for renewable energy resources increase, the alternative energy resource market further develops, and the statutory requirements for advanced energy resources take effect in a current calendar year.

II. ALTERNATIVE ENERGY RESOURCE PLAN

A. Baselines and Benchmarks for Alternative Energy Resource Compliance

Section 4901:1-40-03(B), OAC, provides that an electric utility's baseline for compliance with the alternative energy resource requirements shall be determined using the following methodology:

... the baseline shall be computed as an average of the three preceding calendar years of the total annual number of kilowatt-hours of electricity sold under its standard service offer to any and all retail electric customers whose electric load centers are served by that electric utility and are located within the electric utility's certified territory. The calculation of the baseline shall be based upon the average, annual, kilowatt-hour sales reported in that electric utility's three most recent forecast reports or reporting forms.

In compliance with Section 4901:1-40-03(B) set forth above, the Companies calculated their total annual number of kilowatt-hours of electricity sold to their respective retail electric customers under their standard service offer ("SSO") for each of calendar years 2008, 2009, and 2010 utilizing their three most recent reporting forms (herein referred to respectively as, the "2008 Sales" "2009

Sales" and "2010 Sales"). The Companies then averaged their respective 2008 Sales, 2009 Sales and 2010 Sales to compute their respective 2011 baselines ("2011 Baselines"). The Companies did not make any adjustments to the 2011 Baselines. *See* Appendix A.

The Companies' baselines, for the purpose of this Plan, for 2012 forward are calculated using 2009 Sales and 2010 Sales (when applicable to formulate an average of the three preceding calendar years), and a projected amount of sales for calendar years 2011 forward, in each case to formulate an average of the three preceding calendar years ("Projected Sales"). The Companies then averaged their respective Projected Sales to compute their respective 2012-2021 baselines ("2012-2021 Baselines"), The Companies' forecast years do reflect shopping levels that may occur. See Appendix A. The Companies then calculated their respective renewable energy resources and solar energy resources benchmarks in accordance with Amended Substitute Senate Bill 221. See Appendix A. The Companies do not have a statutory requirement for reporting on advanced energy resources in this ten year planning period.

B. Supply Portfolio Projection

The Companies plan to supply the generation associated with the above baselines in accordance with standard service offer procurement plans ("SSO Procurement Plans").³ These quantities represent the energy that the suppliers of the SSO will be obligated to supply through applicable supplier master agreements associated with the SSO Procurement Plans.

¹ The actual kilowatt hours sold in each of 2008, 2009, and 2010 were reported on the SE-1 Reporting Forms.

² The Companies' baselines for calendar years 2012-2021 will be updated to reflect actual sales when such information becomes available, and shall be reported in the Companies' applicable Annual Status Report and Compliance Review.

³ The Companies' SSO Procurement Plans contemplate power purchases. The Companies do not own generation.

C. Methodology Used to Evaluate Compliance Options

Given that the Companies do not own alternative energy resource facilities, the Companies' methodology or process for assessing compliance options was to evaluate a variety of potential options. Such options included banking and purchasing renewable energy credits ("RECs") through both long-term contracts, short-term spot purchases, and SREC auctions. The Companies also considered building alternative energy resource facilities to generate RECs. However, the Companies are not in the business of generating electricity, renewable or otherwise, and currently do not foresee entering the energy generation business. Thus, the Companies ultimately did not move forward with that option.

The Companies have purchased and plan to continue to purchase RECs through a competitive request for proposal solicitation structure for the duration of this ten year plan ("RFP REC Procurement Process"). The RFP REC Procurement Process is an efficient means of meeting the annual benchmarks as required by Amended Substitute Senate Bill 221 ("SB 221"), and provides the Companies with market intelligence about potential suppliers and the availability of RECs from completed and planned renewable projects. The 2010 RFP REC Procurement Process was managed by Navigant Consulting, Inc. ("NCP"). The particulars of the RFP REC Procurement Process are described more fully in the Companies' Annual Report and request for a force majeure determination in Case No. 11-2479-EL-ACP. The Companies plan to retain an independent consultant for the management of future RFP REC Procurement Processes. In addition to the RFPs that the Companies have already conducted, the Companies have applied for Commission approval of an RFP for 10-year REC purchase agreements in Case No. 10-2891-EL-ACP, which is currently pending before the Commission. Lastly, the Companies will continue to attempt to purchase SRECs (both Ohio and Out-of-State) through auctions, brokers and bilateral agreements.

D. Impediments to Achieving Compliance

The most significant impediment to achieving compliance (particularly for solar renewable energy resources) is the limited availability of renewable energy resources. Such limited availability is exacerbated by the legislative requirement that fifty percent of the renewable energy resource originate from facilities located within Ohio, and the regulatory requirement that renewable energy resource facilities be certified by the Public Utilities Commission of Ohio ("Commission"). Given the length of time it takes to bring a new facility (particularly solar) on line, this impediment is likely to continue for some time into the future.

Moreover, in most cases, siting, easements, permits, interconnections, contracts, and site preparation will require twelve to eighteen months. As a result, unless facilities are well under construction at this time, there is little opportunity for new facilities to come online and produce sufficient RECs for some time. Such facilities will also require Commission certification. In short, although the supply of RECs are likely to increase as the market further develops, the demand will also increase as benchmark requirements increase over time making achieving compliance an ongoing challenge. The Companies may also face an additional challenge in purchasing sufficient solar RECs in 2011 to not only cover the 2011 statutory benchmarks in a tight market, but to also cover, if ordered by the Commission, the 2010 in-state solar RECs shortfall. The Companies' only suggestion for addressing impediments to achieving compliance is for the Commission to remain flexible in the event regulatory relief is necessary as this new market develops.

III. CONCLUSION

The Companies' Plan is filed pursuant to and complies with Section 4901:1-40-03(C), OAC. As stated above, the Plan is speculative in nature and is subject to change as statutory requirements for renewable energy resources increase and sufficient quantities of alternative energy resources

become reasonably available in the marketplace. The Companies appreciate the opportunity to file this initial Plan and expect this Plan will be updated and refined over the ten-year planning horizon.

Respectfully submitted,

/s/ Carrie M. Dunn

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ATTORNEYS FOR OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY AND THE TOLEDO EDISON COMPANY

Ohio Edison Company

Renewable Energy Resources Baselines and Benchmarks

(Megawatt Hours/Year)

Planning baselines and benchmarks in the forecasted years are calculated using forecasted SSO Retail Electric Sales and the same percentage of customer sales taking SSO service as 12/2010 actual. Associated compliance baselines and benchmarks will reflect actual SSO Retail Electric Sales.

-											_		_				,
2021	2020	2019	2018	7102	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007		3	Year
23,693,000	23,693,000	24,084,000	24,447,000	24,562,000	24,640,000	24,734,000	24,793,000	24,712,000	24,444,000	23,926,000						8	Delivery Retail Electric Sales Excluding Losses
25,340,000	25,340,000	25,764,000	26,159,000	26,283,000	26,370,000	26,475,000	26,543,000	26,466,000	26,205,000	25,681,000						Œ	Delivery Retail Electric Sales Including Losses
7.723,918	7,723,918	7.851,364	7,969,722	8,007,212	3,032,640	8.063,284	8,082,518	3,056,112	7,968,744	7,799,876	9,928,845	19,043,752	21,040,189	21,354,818	32.6%	4	Companys Calendar- Month SSO Retail Electric Sales
9,50%	8.50%	7,50%	6.50%	5.50%	4.50%	3.50%	2.50%	2.00%	1.50%	1.00%					Percent of cus	Ø	Renewable Energy Resource Target %
0.38%	0,34%	0.30%	0.26%	0.22%	0.18%	0.15%	0.12%	0.09%	0.06%	0.03%					tomer sales ta	<u> </u>	Solar Energy Resource Target %
7,848,341	7,942,773	8,003,191	8,034,379	8,059,481	8,067,305	8,035,791	7,941,577	8,565,822	12,257,491	16,670,929					32.6% Percent of customer sales taking SSO service on 12/2010 (as shown on PUCO Form	9	Alternative Energy Baselines
745,592	675,136	600,239	522,235	443,271	363,029	281,253	198,539	171,316	183,882	166,709					ice on 12/2010	(8)=(5)*(7)	Renewable Energy Resource Benchmark
28.62	27,005	24,010	20,889	17,731	14,521	12,054	9,530	7,709	7,354	5,001					(as showл on	(9) = (6)*(7)	Solar Energy Resource Benchmark
715,768	648,131	576,229	501,346	425,540	348,508	269,199	189,009	163,607	176,508	161,708					PUCO Form S	(10) = (8)-(9)	Renewable Less Solar Benchmark
										2,068					SE-1)	(11)	Contracted SRECS
3316	3,790	3,790	3,790	3,795	3,816	3,843	3,854	3,362	2,828	2,295						(12)	Long Term solar RFP awaiting PUCO approval
										161,890						(13)	Contracted non-solar RECs
9.475	9,475	9,475	9,474	9,487	9,540	9,506	9,535	9,664	9,428	9,130						(14)	Long Term non-solar RFP awaiting PUCO approval
8 260 84	8,260,840	5,399,06	8,527,83	8,568,258	3,596,62	8,630,854	8,653,018	8,627,916	8,542,834	8,372,004						(15)	Supply Portfolio Projection

Column (2) and (3) PUCO Case No. 10-504-EL-FOR PUCO FORM FE4-D1 (2021 set to equal 2020)

Column (4) = 2007 through 2010 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2021 From Column (2) Times percent of customer sales taking SSO service on 12/2010

Column (5) and (6) from OAC 4901:1-40-03 (A) [Column (9) is not incremental to Column (8)]

Column (7) Average of the three preceding calendar years of Column (4)

Column (8) and (9) from OAC 4901:1-40-03 (A) [Column (9) is not incremental to Column (8)]

Columns (12) & (14) = Filed in Case 10-2891-EL-ACP, as stipulated to in 10-0389-EL-SSO.

Column (15) = Column (3) times the percent of customer sales taking SSO service on 12/2010 Service Offer percent of delivery retail electric sales, SSO supplier is obligated to provide Standard Service Offer percent of delivery retail electric sales including distribution bosses.

The Cleveland Electric Illuminating Company

Renewable Energy Resources Baselines and Benchmarks

(Megawatt Hours/Year)

Planning baselines and benchmarks in the forecasted years are calculated using forecasted SSO Retail Electric Sales and the same percentage of customer sales taking SSO service as 12/2010 actual. Associated compliance baselines and benchmarks will reflect actual SSO Retail Electric Sales.

_	_			_			-									
2021	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007		(E)	Year
18,570,000	18,843,000	19,108,000	19,188,000	19,258,000	19,347,000	19,215,000	18,556,000	18,291,000	18,215,000						(2)	Delivery Retail Electric Sales Excluding Losses
19,968,000	20,266,000	20,554,000	20,643,000	20,719,000	20,816,000	20,679,000	19,984,000	19,709,000	19,650,000						(3)	Delivery Retail Electric Sales Including Losses
5,459,580	5,539,842	5,617,752	5,641,272	5,661,852	5,688,018	5,649,210	5,455,464	5,377,554	5,355,210	6,981,965	14,450,199	17,157,556	17,403,753	29.4%	(4)	Company's Calendar- Month SSO Retail Electric Sales
9,50%	7.50%	6.50%	5,50%	4,50%	3.50%	2.50%	2.00%	1,50%	1_00%					29.4% Percent of customer sales taking SSO service on 12/2010 (as shown on PUCO Form SE-1)	(5)	Renewable Energy Resource Target %
0.38%	0.30%	0.26%	0.22%	0.18%	0.15%	0.12%	0.09%	0.06%	0.03%					tomer sales ta	(6)	Solar Energy Resource Target %
5,539,058	5,640,292	5,663,714	5,666,360	5,597,564	5,494,076	5,396,076	5,904,910	8,929,125	12,863,240					king SSO servi	Э	Alternative Energy Baselines
526,211	423,022	368,141	311,650	251,890	192,293	134,902	118,098	133,937	128,632					ice on 12/2010	(8)=(5)*(7)	Renewable Energy Resource Benchmark
19,039 21,048	16,921	14,726	12,466	10,076	8,241	6,475	5,314	5.357	3,859					(as shown on	(9) = (6) - (7)	Solar Energy Resource Benchmark - SRECs
505,163 505,163	406,101	353,415	239,184	241,814	184,052	128,427	112,784	128,580	124,773					PUCO Form S	(10) = (8)-(9)	Renewable Less Solar Benchmark - RECs
									1,596					ę.	(11)	Contracted SRECS
2340	2,671	2,672	2,668	2,648	2,627	2,619	2,332	2,060	1,771						(12)	Long Term solar RFP awaiting PUCO approval
									124,913						(13)	Contracted non-solar RECs
6,680 6,687	6,677	6,679	6,670	6,620	6,568	6,546	6,662	6,868	7,083						(7.4)	Long Term non-solar REP awaiting PUCO approval
5,870,592 5,870,592	5,958,204	6,042,876	6,069,042	6,091,386	6,119,904	6,079,626	5,875,296	5,794,446	5,777,100						(15)	Supply Portfolio Projection

Column (2) and (3) PUCO Case No. 10-504-EL-FOR PUCO FORM FE4-01 (2021 set to equal 2020)
Column (4) = 2007 through 2010 From PUCO Form(s) SE-1; Monthly Historical Electricity Data, Part A
= 2011 through 2021 From Column (2) Times percent of customer sales taking SSO service on 12/2010
Column (5) and (6) from OAC 4501:1-40-03 (A)

Column (7) Average of the three preceding calendar years of Column (4)

Column (8) and (9) from OAC 4901:1-40-03 (A) [Column (9) is not incremental to Column (8)]

Column (10) = Net renewable benchmark

Columns (12) & (14) = Filed in Case 10-2891-EL-ACP, as stipulated to in 10-0388-EL-SSO.

Column (15) = Column (3) times the percent of customer sales taking SSO service on 12/2010 Service Offer percent of delivery retail electric sales, SSO supplier is obligated to provide Standard Service Offer percent of delivery retail electric sales including distribution losses,

The Toledo Edison Company

Renewable Energy Resources Baselines and Benchmarks

(Megawatt Hours/Year)

Planning baselines and benchmarks in the forecasted years are calculated using forecasted SSO Retail Electric Sales and the same percentage of customer sales taking SSO service as 12/2010 actual. Associated compliance baselines and benchmarks will reflect actual SSO Retail Electric Sales.

			_													,
2021	200	200	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007		3	Year
10,210,000	10,384,000	10,5/1,000	10,631,000	10,668,000	10,687,000	10,649,000	10,495,000	10,237,000	10,128,000						Ś	Delivery Retail Electric Sales Excluding Losses
10,715,000	000,418,010	11,103,000	11,170,000	11,209,000	11,234,000	11,198,000	11,044,000	10,784,000	10,701,000						Q	Delivery Retail Electric Sales Including Losses
3,124,260	0.100,004 0.100,004	3,234,726	3,253,086	3,263,796	3,270,222	3,258,594	3,211,470	3,132,522	3,099,168	3,537,132	7,815,831	9,006,924	9,228,709	30.6%	3	Company's Calendar- Month SSO Retail Electric Sales
3.50% 3.50%	2.50%	6.50%	5.50%	4.50%	3.50%	2.50%	2,00%	1.50%	1.00%					Percent of cus	G	Renewable Energy Resource Target %
0.38%	0.30%	0.26%	0.22%	0.18%	0.15%	0.12%	0.09%	0.06%	0,03%					tomer sales ta	Ŷ	Solar Energy Resource Target %
3,179,850	3,250,536	3,262,368	3,264,204	3,246,762	3,200,862	3,147,720	3,256,274	4,817,377	6,786,629					30.6% Percent of customer sales taking SSO service on 12/2010 (as shown on PUCO Form	Э	Alternative Energy Baselines
2/3,93/ 302,086	243,790	212,054	179,531	146,104	112,036	78,693	65,125	72,261	67,866					ice on 12/2010	(8)=(5)*(7)	Renewable Energy Resource Benchmark
10,957 12,083	9,752	8,482 28,482	7,181	5,844	4,801	3,777	2,931	2,890	2,036					(as shown on	(9)=(6)*(7)	Solar Energy Resource Benchmark - SRECs
262,980	234,038	203,572	172,350	140,260	107,229	74,916	62,194	69,371	65,830					PUCO Form S	$(10) \approx (8)-(9)$	Renewable Less Solar Benchmark - RECs
									84 84					SE-1)	(11)	Commaded SRECS
1,538 1,344	1.539	1,539	1,537	1,536	1,530	1,527	1,286	1,111	934 438						(12)	Long Term solar RFP awaiting PUCO approval
									65,904						(13)	Contracted non-solar RECs
3,344 3,839	3,848	3,847	3,842	3,840	3,826	3,819	3,674	3,705	3,737						(14)	Long Term non-solar RFP awaiting PUCO approval
3, <i>2</i> 78,790 3, <i>2</i> 78,790	3,339,684	3,397,518	3,418,020	3,429,954	3,437,604	3,426,588	3,379,464	3,299,904	3,274,506						(15)	Supply Portfolio Projection

Column (2) and (3) PUCO Case No. 10-504-EL-FOR PUCO FORM FE4-D1 (2021 set to equal 2020)
Column (4) = 2007 through 2010 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A
= 2011 through 2021 From Column (2) Times percent of customer sales taking SSO service on 12/2010
Column (5) and (6) from OAC 490111-40-03 (A)
Column (7) Average of the three preceding calendar years of Column (4)
Column (8) and (9) from OAC 490111-40-03 (A) [Column (9) is not incremental to Column (8)]

Column (10) = Net renewable benchmark

Columns (12) & (14) = Filed in Case 10-2891-EL-ACP, as stipulated to in 10-0389-EL-SSO.

Column (15) = Column (3) times the percent of customer sales taking SSO service on 12/2010 Service Offer percent of delivery retail electric sales including distribution losses.

SSO supplier is obligated to provide Standard Service Offer percent of delivery retail electric sales including distribution losses.

Total Ohio

Renewable Energy Resources Baselines and Benchmarks

	(Megawatt Hours) Year)	SV Ear	Planning base	lines and bend SSO se	hmarks in the	nd benchmarks in the forecasted years are calculated using forecasted SSO Ret SSO service as 12/2010 actual. Associated compliance baselines and benchmar	ars are calcula ociated compli	ted using forec	asted SSO Resand benchma	dail Electric Sa arks will reflect	ail Electric Sales and the same percentage of c rks will reflect actual SSO Retail Electric Sales.	ume percentag ketail Electric i	Planning baselines and benchmarks in the forecasted years are calculated using forecasted SSO Retail Electric Sales and the same percentage of customer sales taking SSO service as 12/2010 actual. Associated compliance baselines and benchmarks will reflect actual SSO Retail Electric Sales.	sales taking
Year	Delivery Retail Electric Sales Excluding Losses	Delivery Retail Electric Sales Including Losses	Company's Calendar- Month SSO Retail Electric Sales	Renewable Energy Resource Target %	Solar Energy Resource Target %	Alternative Energy Baselines	Renewable Energy Resource Benchmark	Solar Energy Resource Benchmark - SRECs	Renewable Less Solar Benchmark - RECs	Contracted SRECS	Long Term solar RFP awaiting PUCO approval	Contracted non-solar RECs	Long Term non-solar RFP awaiting PUCO approval	Supply Portfolio Projection
3	Ð	ଔ	(4)	(5)	(8)	Ø	(8)=(5)*(7)	(3)=(6)*(7)	(10) == (8)-(9)	(3.1)	(12)	(13)	(14)	(15)
			31.1%	Percent of cus	tomer sales ta	31.1% Percent of customer sales taking SSO service on 12/2010 (weighted average of PUCO	ice on 12/2010	(weighted ave	rage of PUCO	Forms SE-1)				
2007 2008 2009 2010			47,987,280 47,204,669 41,309,781 20,447,942											
201.	52,269,000	56,032,000	16,254,254	1.00%	0,03%	36,320,798	363,207	10,396	352,311	4,506	5,000	352,707	20,000	17,423,612
2012 2013	52,972,000 53,763,000	56,698,000 57,494,000	16,478,820	1.50% 2.00%	0.09%	26,003,993 17,727,006	390,060	15,601 15,954	374,459 338,585		5,000 7,000		22,000	17,637,180
2014	54,657,000	58,420,000	16,990,322	2.50%	0,12%	16,485,373	412,134	19,782	392,352		8,000		20,000	18,159,232
2015	54,768,000	58,525,000	17,021,524	3.50%	0,15%	16,730,729	585,576	25,096	560,480		8,000		20,000	18,188,358
2016	54,564,000	58,298,000	16,958,288	4,50%	0.18%	16,911,631	761,023	30,441	730,582		8,000		20,000	18,117,960
2017	54,381,000	58,096,000	16,901,570	5.50%	0.22%	16,990,045	934,452	37,378	897,074		8,000		20,000	18,055,320
2018	54,126,000	57,816,000	16,822,200	8,50%	0.26%	16,960,461	1,102,430	44,097	1,058,333		8,000		20,000	17,968,228
2019	53,321,000	56,944,000	16,571,790	7.50%	0.30%	16,894,019	1,267,051	50,683	1,216,368		8,000		20,000	17,696,952
2020	52,473,000	56,023,000	16,307,758	8.50%	0.34%	16,765,187	1,425,041	57,001	1,368,040		8,000		20,000	17,410,222
2021	52,473,000	56,023,000	16.307.758	9,50%	0.38%	16,567,249	1,573,889	62,955	1,510,934		7,000		20,000	17,410,222

Column (2) and (3) PUCO Case No. 10-504-EL-FOR PUCO FORM FE4-D1 (2021 set to equal 2020)

Column (4) = 2007 through 2010 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2021 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2021 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2021 From PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2010 From PUCO Form PUCO Form(s) SE-1: Monthly Historical Electricity Data, Part A

= 2011 through 2010 From PUCO Form PUCO Form(s) SE-1: Monthly Historical Electric SSO service on 12/2010

Column (5) and (6) from OAC 4901:1-40-03 (A) [Column (9) is not incremental to Column (8)]

Column (8) and (9) from OAC 4901:1-40-03 (A) [Column (9) is not incremental to Column (8)]

Column (10) = Net reviewable benchmark

Column (10) = Net reviewable benchmark

Column (10) = Ried in Case 10-2891-EL-ACP, as stipulated to in 10-0388-EL-SSO.

Column (15) = Column (3) times the percent of customer sales taking SSO service on 12/2010 Service Offer percent of delivery retail electric sales, including distribution losses.

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Summary: Text Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company Alternative Energy Plan 2011 through 2021 electronically filed by Ms. Carrie M Dunn on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company