

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

FirstEnergy Generation, LLC's)	
Notice of Filing Environmental Control)	Case No. 13-0915-EL-ECP
Plan)	

Pursuant to O.A.C. 4901:1-41-03(B) and (C), FirstEnergy Generation, LLC hereby submits its 2013 Environmental Control Plan.¹

Respectfully submitted,

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¹ FirstEnergy Generation, LLC is not a public utility as defined in R.C. § 4905.02, and its facilities are not owned or operated by a public utility subject to the Commission's jurisdiction. Thus, FirstEnergy Generation, LLC's generating facilities are not within the scope of R.C. § 4928.68, from which O.A.C. 4901:1-41-03 (the "Rule") was promulgated. The Commission previously has indicated its position that FirstEnergy Generation, LLC is subject to the Rule. Therefore, FirstEnergy Generation, LLC submits this Environmental Control Plan in an abundance of caution and without waiving its arguments as to the Commission's jurisdiction.

As required in Chapter 4901: 1-41(B) and (C) of the Commission's Rules, FirstEnergy Generation, LLC ("FirstEnergy") submits the following Environmental Control Plan.

Introduction

FirstEnergy is committed to protecting the environment while delivering safe, reliable electricity to millions of customers in the Midwest and Mid-Atlantic regions. In keeping with its balanced, long-term approach, FirstEnergy is continually looking for ways to minimize the impact of its operations on the environment, including impact to water, land and air.

Since 1990, FirstEnergy has seen a 28 percent decrease in CO₂ emissions. FirstEnergy has taken aggressive steps over the past two decades that have increased its generating capacity without adding to overall CO₂ emissions. For example, since 1990, FirstEnergy has added more than 1800 MW of non-emitting nuclear capacity. Through these actions, FirstEnergy has increased its generating capacity while avoiding CO₂ emissions.

Current Conditions

As reported to the US EPA's Mandatory Greenhouse Gas Reporting Rule, FirstEnergy's Ohio electric generating facilities emitted approximately 15 million metric tons of carbon dioxide equivalent in 2012.

Potential Actions and Goals

Due to current and pending regulations, FirstEnergy has developed goals and strategies for reducing air emissions, including reductions of CO₂ from stationary combustion sources. FirstEnergy plans to achieve these reductions through numerous actions including fuel adjustments, new emission controls, and possible reduced or seasonal use of select units as deemed necessary.

In January 2012, FirstEnergy announced the anticipated shutdown of 10 Ohio units (Ashtabula, Bay Shore 2-4, Eastlake 1-5, Lakeshore). None of these units are expected to operate after the first quarter of 2015. These actions will also reduce FirstEnergy's CO₂ emissions.

In conjunction with these plans, FirstEnergy has developed further goals to increase FirstEnergy's use of generation from renewable sources, such as wind and solar. FirstEnergy also has developed plans to increase energy efficiency in states in which FirstEnergy delivers electricity. These plans will ultimately result in reduced emissions, including carbon dioxide emissions.

FirstEnergy continues to invest in research and development projects that will help reduce emissions:

- FirstEnergy has worked with Powerspan Corp. in the design of an ECO₂ process to concentrate and remove CO₂ from fossil-fired unit flue gas exhaust.
- FirstEnergy funded the development of a carbon capture technology known as the “Chilled Ammonia Process” through EPRI.
- FirstEnergy participated with B&W in their pilot demonstration of oxy-coal combustion. This process replaced combustion air with oxygen, resulting in a concentrated stream of CO₂ for capture and sequestration.
- FirstEnergy participated with Independence Bio-Products on a pilot facility using algae to capture CO₂ from ECO flue gas. The algae were grown in open ponds fed with clean ECO flue gas.
- FirstEnergy is a partner in the Midwest Regional Carbon Sequestration Partnership, a program sponsored by the U.S. Department of Energy.
- In collaboration with Ballard Power Systems of Vancouver, British Columbia, FirstEnergy is continuing a multiyear test of a utility-scale fuel cell unit that uses hydrogen for fuel and oxygen from the air around us. The system produces clean electricity – efficiently and without combustion. The fuel cell, located at FirstEnergy’s Eastlake Plant in Eastlake, Ohio, produced 1 MW of electricity – enough to power some 600 homes – with only heat and water as byproducts.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *FirstEnergy Generation, LLC's Notice of Filing Environmental Control Plan* was served this 15th day of April, 2013, via first-class U.S. mail, postage prepaid, on the following:

Scott J. Nally, Director
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
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/s/ Laura C. McBride
One of the Attorneys for FirstEnergy Generation, LLC

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Case No(s). 13-0915-EL-ECP

Summary: Notice of Filing Environmental Control Plan electronically filed by Ms. Laura C. McBride on behalf of FirstEnergy Generation, LLC