

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company, and The Toledo Edison Company for) Case No. 14-1297-EL-SSO
Authority to Provide for a Standard Service)
Offer Pursuant to R.C. 4928.143 in the Form of)
An Electric Security Plan)**

**OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY, AND THE TOLEDO EDISON COMPANY’S MOTION FOR EXTENSION
OF TIME TO FILE TARIFFS**

[EXPEDITED CONSIDERATION REQUESTED]

Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the “Companies”) respectfully request a 25 day extension of time, through and including May 26, 2016, to file tariffs consistent with the Commission’s Opinion and Order dated March 31, 2016 (“ESP Order”). This extension is needed to allow the Companies to consider and address the Order recently issued by Federal Energy Regulatory Commission (“FERC”) which may impact this proceeding.

As the ESP Order originally anticipated a tariff filing by May 1, 2016, the Companies respectfully request an expedited ruling on this Motion pursuant to OAC 4901-1-12(C).

Respectfully Submitted,

/s/ James W. Burk

James W. Burk (0043808)
Counsel of Record
Carrie M. Dunn (0076952)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
Telephone: (330) 384-5861
Fax: (330) 384-8375
burkj@firstenergycorp.com
cdunn@firstenergycorp.com

David A. Kutik (0006418)
JONES DAY
901 Lakeside Avenue
Cleveland, OH 44114
Telephone: (216) 586-3939
Fax: (216) 579-0212
dakutik@jonesday.com

James F. Lang (0059668)
N. Trevor Alexander (0080713)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
Telephone: (216) 622-8200
Fax: (216) 241-0816
jlang@calfee.com
talexander@calfee.com

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

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company, and The Toledo Edison Company for) Case No. 14-1297-EL-SSO
Authority to Provide for a Standard Service)
Offer Pursuant to R.C. 4928.143 in the Form of)
An Electric Security Plan)**

**MEMORANDUM IN SUPPORT OF OHIO EDISON COMPANY, THE CLEVELAND
ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY'S
MOTION FOR EXTENSION OF TIME TO FILE TARIFFS**

[EXPEDITED CONSIDERATION REQUESTED]

In the ESP Order the Commission made several findings regarding the Companies tariffs.

Most relevant here, the Commission held that:

The Companies shall file tariffs by May 1, 2016. With its initial filing and annually thereafter, FirstEnergy will provide to Staff customer bill impacts and proposed rate mitigation measures, if necessary.¹

After the Commission made this determination, FERC issued an order which may affect this proceeding on April 27, 2016 (the “FERC Order”).² The FERC Order specifically addressed this proceeding and made several findings which may impact this proceeding. Among other things, the FERC Order held the Companies have “captive customers” and that the proposed purchase power agreement with FirstEnergy Solutions Corp. was subject to FERC review.

As the FERC Order was not issued until the evening of April 27, 2016, the Companies have not yet had an opportunity to fully analyze the FERC Order and determine how the FERC Order may impact the tariffs which the ESP Order instructed be filed by May 1, 2016.

¹ ESP Order, p. 99.

² See 155 FERC ¶ 61,101, Docket No. EL 16-34-000, Order Granting Complaint issued April 27, 2016.

Accordingly, the Companies hereby request a brief extension of time, through and including May 26, 2016, in order for them to review the FERC Order and then make any appropriate filings at the Commission as may be appropriate based on that review.

The Companies respectfully request an expedited ruling on this Motion pursuant to OAC 4901-1-12(C) due to the extremely time sensitive nature of this request.³

³ Due to the extremely time sensitive nature of this request, the Companies have not contacted the numerous parties to this proceeding to seek their consent to this Motion.

Respectfully Submitted,

/s/ James W. Burk

James W. Burk (0043808)
Counsel of Record
Carrie M. Dunn (0076952)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
Telephone: (330) 384-5861
Fax: (330) 384-8375
burkj@firstenergycorp.com
cdunn@firstenergycorp.com

David A. Kutik (0006418)
JONES DAY
901 Lakeside Avenue
Cleveland, OH 44114
Telephone: (216) 586-3939
Fax: (216) 579-0212
dakutik@jonesday.com

James F. Lang (0059668)
N. Trevor Alexander (0080713)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
Telephone: (216) 622-8200
Fax: (216) 241-0816
jlang@calfee.com
talexander@calfee.com

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

CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 29th day of April, 2016. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties. Further, a courtesy copy has been served upon parties via electronic mail.

/s/ N. Trevor Alexander
One of Attorneys for the Companies

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/29/2016 11:00:13 AM

in

Case No(s). 14-1297-EL-SSO

Summary: Motion For Extension Of Time To File Tariffs electronically filed by Mr. Nathaniel Trevor Alexander on behalf of Ohio Edison Company and The Cleveland Illuminating Company and The Toledo Edison Company