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Via E-FILE

June 10, 2016

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 14-1297-EL-SSO

Dear Sir/Madam:

Please find attached the MEMORANDUM CONTRA APPLICATION FOR REHEARING OF THE OHIO ENERGY GROUP e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



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MLKkew

Encl.

Cc: Certificate of Service

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of The Ohio Edison :
Company, The Cleveland Electric Illuminating Company, :
And The Toledo Edison Company For Authority To : **Case No. 14-1297-EL-SSO**
Establish A Standard Service Offer Pursuant To R.C. :
§4928.143 In The Form Of An Electric Security Plan. :

**MEMORANDUM CONTRA APPLICATION FOR REHEARING
OF THE OHIO ENERGY GROUP**

The Ohio Energy Group (“OEG”) submits this Memorandum Contra the Application for Rehearing filed by The Office of the Ohio Consumers’ Counsel and Northwest Ohio Aggregation Coalition (“OCC/NOAC”) on May 31, 2016. In its Application for Rehearing, OCC/NOAC claims that the Retail Rate Stability Rider (“Rider RRS”) tariff filed by FirstEnergy on May 13, 2016 is inconsistent with the Commission’s March 31, 2016 Opinion and Order in this case. OCC/NOAC therefore alleges that the Commission erred when it approved the FirstEnergy’s filed tariffs on May 25, 2016.

The Commission should deny OCC/NOAC’s request for rehearing. OCC/NOAC’s argument has already been raised and rejected in this proceeding.¹ Staff found that the tariffs filed by FirstEnergy, including the Rider RRS tariff, “*appear to be in compliance with the Commission’s Opinion and Order.*”² And the Commission expressly held that FirstEnergy’s tariff filing “*is consistent with the Opinion and Order, does not appear to be unjust and unreasonable, and should be approved for rates effective June 1, 2016.*”³ Further, because the Commission has found the Rider RRS tariff to be consistent with its March 31, 2016 Opinion and Order, OCC/NOAC’s claims that approval of the tariff violated R.C. 4928.141(B) and R.C. 4928.143(B)(2)(d) are without merit.

¹ OCC/NOAC Comments (May 16, 2016) at 8.

² Staff Review and Recommendations (May 20, 2016).

³ Finding and Order (May 25, 2016) at ¶13.

Respectfully submitted,



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June 7, 2016

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 10th day of June, 2016 to the following:



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