



## Office of the Ohio Consumers' Counsel

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July 17, 2018

Barcy F. McNeal, Secretary  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

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

Dear Ms. McNeal:

Without waiving or conceding any arguments with respect to the notice provision in R.C. 4903.16, the Northwest Ohio Aggregation Coalition, the Ohio Consumers' Counsel and the Ohio Manufacturers' Association Energy Group ("Joint Movants") notify the Public Utilities Commission of Ohio ("PUCO") of their intent to request that the Supreme Court of Ohio stay the PUCO's Orders and Entries that are under appeal in S.Ct. Nos. 2017-1444 and 2017-1664. Those PUCO decisions authorized FirstEnergy to collect a distribution modernization rider charge from customers. The distribution modernization charge has been collected from customers since January 1, 2017 and will continue for at least three years.

Joint Movants intend to request, on or after July 20, 2018, that the Supreme Court of Ohio stay the PUCO Orders under appeal in S.Ct. Nos. 2017-1444 and 2017-1664, pending the outcome of Joint Movants' appeals. Please consider this letter to be the notice required by R.C. 4903.16.

Sincerely,

/s/ Maureen R. Willis

Maureen R. Willis  
Senior Counsel  
Assistant Consumers' Counsel

cc: Parties of record

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/17/2018 10:56:38 AM**

**in**

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

Summary: Notice Notice of Intent to File Stay on Behalf of the Northwest Ohio Aggregation Coalition, the Ohio Consumers' Counsel and the Ohio Manufacturers' Association Energy Group ("Joint Movants") electronically filed by Ms. Deb J. Bingham on behalf of Willis, Maureen R Mrs.