

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE POWERFORWARD</b>	)	
<b>DISTRIBUTION SYSTEM PLANNING</b>	)	<b>CASE No. 18-1596-EL-GRD</b>
<b>WORKGROUP</b>	)	
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**COMMENTS OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC  
ILLUMINATING COMPANY AND THE TOLEDO EDISON COMPANY**

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**INTRODUCTION**

Pursuant to the Attorney Examiner’s Entry on November 14, 2018, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (“Companies”) hereby submit comments on the proposed current-state assessment report of the electric utilities’ distribution systems (the “Current-State Assessment Report” or the “Report”), which is proposed as part of the Commission’s PowerForward grid modernization initiative. The Companies look forward to collaborating with the Commission, Commission Staff, and other interested parties on the steps outlined in the PowerForward Roadmap. The Companies appreciate the opportunity to comment and request that the Commission consider and implement these comments and recommendations into the final requirements for the Current-State Assessment Report.

**COMMENTS**

**1. Current-State Assessment Report Filing Deadline**

The Companies agree with the Attorney Examiner’s proposed filing date of April 1, 2019 for the Companies’ Current-State Assessment Report.

## 2. Contents of the Current-State Assessment Report

The PowerForward Roadmap lists the components that the Commission is asking electric distributing utilities to include in their Current-State Assessment Reports<sup>1</sup>. The Companies intend to provide the requested information to the extent reasonably practical, but offer the following comments and recommendations for consideration.

The information submitted in the Report should not be utilized by the Commission or non-utility stakeholders to circumvent the role of the Companies and other electric distributing utilities as the managers of the distribution planning process and owners of their distribution systems. The Companies have unparalleled expertise in electrical engineering by experienced and knowledgeable utility engineers, and unmatched familiarity with their own distribution systems and their customers' needs. The Companies are therefore in the best position to manage the distribution planning process to the benefit of their customers.<sup>2</sup> Moreover, the Companies are solely responsible for the safety and reliability of their distribution systems, and that accountability cannot be transferred to a third-party energy provider.<sup>3</sup> Non-utility stakeholders should not be given the opportunity through PowerForward to make recommendations or exert any degree of influence over the Companies' management of their own distribution systems.

Given these concerns, the Companies encourage the Commission to develop parameters to ensure that the information included in the Reports will be used appropriately. The Companies believe the Reports can, and should, be used to facilitate collaborative discussions with interested stakeholders. However, the information in the Companies' Report should not be used as the subject

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<sup>1</sup> See PowerForward Roadmap at 18-19.

<sup>2</sup> See PowerForward Roadmap at 11-12.

<sup>3</sup> See generally PowerForward Roadmap at 19; see also Comments of Tom Pryatel, Director, Energy Delivery Operations Services, FirstEnergy, at PowerForward Phase 3, "Distribution System Planning: Utility Perspectives" (Mar. 6, 2018).

of litigation or as a tool for discovery. The Companies believe that any threat of litigation will stifle the effectiveness of the PowerForward Collaborative, and therefore suggest avoiding this outcome by developing and enforcing appropriate parameters around the use of the Report and the information it will contain.

Finally, the Companies consider some of the information included in the outline for the Report in the PowerForward Roadmap to be confidential and proprietary, and potentially critical energy infrastructure information. The Companies suggest that the level of detail for the Report be carefully weighed in order to mitigate these confidentiality concerns, and recommend that any confidential or proprietary information not be included in the Report filed April 1, 2019. The Companies will work collaboratively with the Commission to ensure proper protections are in place prior to the Companies' submission of any such information to the Commission as part of PowerForward.

### **CONCLUSION**

The Companies respectfully urge the Commission to adopt the comments and recommendations of the Companies set forth above. The Companies request the opportunity to file reply comments following their review of the other comments filed in the above-captioned proceeding.

Respectfully submitted,

/s/ Emily V. Danford

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*On behalf of Ohio Edison Company,  
The Toledo Edison Company, and  
The Cleveland Electric Illuminating  
Company*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Comments of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company were filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 4<sup>th</sup> day of December 2018. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Emily V. Danford  
An Attorney for Ohio Edison  
Company, The Toledo Edison  
Company, and The Cleveland  
Electric Illuminating Company

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

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 18-1596-EL-GRD**

Summary: Comments of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company electronically filed by Ms. Emily V Danford on behalf of The Cleveland Electric Illuminating Company and Ohio Edison Company and The Toledo Edison Company