BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Filing by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company of a Grid Modernization Business Plan))))	Case No.	16-481-EL-UNC
In the Matter of the Filing by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company Application for Approval of a Distribution Platform Modernization Plan)))))	Case No.	17-2436-EL-UNC
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company to Implement Matters Relating to the Tax Cuts and Jobs Act of 2017))))))	Case No.	18-1604-EL-UNC
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of a Tariff Change))))	Case No.	18-1656-EL-ATA

OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING, AND THE TOLEDO EDISON COMPANY'S MEMORANDUM CONTRA MOTION TO EXTEND DEADLINE FOR FILING TESTIMONY

Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the "Companies") oppose, in part, the Motion to Extend Deadline for Filing Testimony ("Motion") filed by the Office of the Ohio Consumers' Counsel ("OCC") on January 18, 2019.¹ Regardless, the Companies are willing to accommodate OCC's concerns in a reasonable manner described below.

¹ OCC seeks expedited treatment of its Motion under O.A.C. 4901-1-12(C), which the Companies do not oppose.

The Companies agree with OCC that settlement discussions have continued and have been fruitful. The Companies' goal is to file a Supplemental Stipulation and Recommendation by Tuesday, January 22, 2019. To address OCC's concerns, the Companies recommend that the Hearing Examiner grant a one (1) day extension for filing testimony opposing the settlement, until Wednesday, January 23, 2019.

The Companies respectfully request that the Hearing Examiner deny, in part, the Motion and issue an entry extending the deadline for filing testimony under the terms discussed above.

Respectfully Submitted,

<u>/s/</u><u>James F. Lang</u> Brian J. Knipe (0090299) (Counsel of Record) FirstEnergy Service Company 76 South Main Street Akron, Ohio 44308 bknipe@firstenergycorp.com 330-384-5795 330-384-3875 (fax)

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

CERTIFICATE OF SERVICE

I certify that the foregoing Memorandum Contra was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 21st day of January, 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ James F. Lang

One of the Attorneys for Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company

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Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-ATA

Summary: Memorandum Contra Motion to Extend Deadline for Filing Testimony electronically filed by Mr. James F Lang on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company