

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the :  
Distribution and Modernization Rider of :  
Ohio Edison Company, The Cleveland : Case No. 17-2474-EL-RDR  
Electric Illuminating Company, and The :  
Toledo Edison Company. :

---

**MOTION FOR AN EXTENSION OF TIME  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

---

On March 31, 2016, in Case No. 14-1297-EL-SSO, the Commission issued an Opinion and Order (O&O) that approved the application of Ohio Edison Company, The Cleveland Illuminating Company, and The Toledo Edison Company (FirstEnergy) an electric service plan (ESP). On October 12, 2016, in its Fifth Entry on Rehearing, the Commission authorized FirstEnergy to implement a distribution modernization rider (Rider DMR). The Commission, in its Eighth Entry on Rehearing (August 16, 2017), further directed Staff to conduct an ongoing review of the use of the Rider DMR during the term of the ESP.

In an Entry issued on January 24, 2018, in Case No. 17-2474-EL-UNC, the Commission selected Oxford Advisors, LLC (Oxford) as the third-party monitors to assist Staff in performing the compliance review of FirstEnergy's Rider DMR. The timeline in the Commission's Eighth Entry on Rehearing requires Oxford to file an interim report sixty days after a request is received by FirstEnergy to extend the Rider DMR. FirstEnergy filed its Rider DMR extension request on February 1, 2019, in Case

No. 19-361-EL-RDR, making the interim report due by April 1, 2019. The Staff hereby requests that the due date for the interim report be extended to April 29, 2019. The reasons for this motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

*/s/ Thomas W. McNamee*

---

**Thomas W. McNamee**

Assistant Attorney General

Public Utilities Section

30 East Broad Street, 16<sup>th</sup> Floor

Columbus, Ohio 43215-3414

614.466.4395 (telephone)

614.644.8764 (facsimile)

thomas.mcnamee@ohioattorneygeneral.gov

**On Behalf of the Staff of**

**The Public Utilities Commission of Ohio**

---

**MEMORANDUM IN SUPPORT**

---

Under the requirements of the RFP issued on January 24, 2018 in this case, Oxford is presently required to file an interim report with the Commission by April 1, 2019. Oxford has informed Staff that they will require additional time to complete the report. Accordingly, the Staff requests that Oxford be granted an extension of time until April 29, 2019 to file the interim report.

Respectfully submitted,

*/s/ Thomas W. McNamee*

---

**Thomas W. McNamee**

Assistant Attorney General

Public Utilities Section

30 East Broad Street, 16<sup>th</sup> Floor

Columbus, Ohio 43215-3414

614.466.4395 (telephone)

614.644.8764 (facsimile)

thomas.mcnamee@ohioattorneygeneral.gov

**On Behalf of the Staff of**

**The Public Utilities Commission of Ohio**

## PROOF OF SERVICE

I certify that a true copy of the foregoing **Motion for an Extension of Time and Memorandum in Support**, submitted on behalf of the Staff of the Public Utilities Commission, was served via electronic mail on March 18, 2019, upon the following Parties of Record.

*/s/ Thomas W. McNamee*

---

**Thomas W. McNamee**  
Assistant Attorney General

### **Parties of Record:**

mkurtz@bkllawfirm.com  
kboehm@bkllawfirm.com  
jkylercohn@bkllawfirm.com

scasto@firstenergycorp.com  
bknipe@firstenergycorp.com  
william.michael@occ.ohio.gov

### Attorney Examiners:

megan.addison@puc.state.oh.us  
gregory.price@puc.state.oh.us

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

**Commission of Ohio Docketing Information System on**

**3/18/2019 4:27:12 PM**

**in**

**Case No(s). 17-2474-EL-RDR**

Summary: Motion for an Extension of Time electronically filed by Ms. Yvette L Yip on behalf of the Public Utilities Commission of Ohio