FirstEnergy

76 South Main St.
Akron, Ohio 44308

August 30, 2019

Mrs. Barcy McNeal
Commission Secretary
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

SUBJECT: Case Nos. 18-1647-EL-RDR
89-6008-EL-TRF

Dear Mrs. McNeal:

In response to and compliance with the Orders of June 30, 2010, July 18, 2012 and March 31, 2016, in Case Nos. 09-1820-EL-ATA, 12-1230-EL-SSO and 14-1297-EL-SSO ("ESP IV"), respectively, please file the attached tariff pages on behalf of The Toledo Edison Company. These tariff pages reflect changes to Rider AMI and its associated pages.

By filing these tariffs, The Toledo Edison Company is not relinquishing or otherwise diminishing its right to withdraw the ESP IV as permitted under R.C. 4928.143.

Please file one copy of the tariffs in Case Nos. 18-1647-EL-RDR and 89-6008-EL-TRF, and two copies to the Staff. Thank you.

Sincerely,

Santino L. Fanelli

Santino L. Fanelli
Director, Rates & Regulatory Affairs

Enclosures

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The following rates, rules and regulations for electric service are applicable throughout the Company's service territory except as noted.

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RIDER AMI
Advanced Metering Infrastructure / Modern Grid Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules, with the exception of General Service - Transmission (Rate "GT"). This Advanced Metering Infrastructure / Modern Grid Rider charge is a fixed monthly charge and will be effective for service rendered beginning October 1, 2019. This Rider is not avoidable for customers during the period the customer takes electric generation service from a certified supplier.

CHARGE *:

RS	$ 0.572
GS	$ 2.786
GP	$30.595
GSU	$40.903
STL (per lighting unit)	$ 0.155
TRF	$ 0.433
POL	$ 0.560

* The charges listed above, except those for rate schedule STL, will be applied per customer, per month. Any customer who receives electric service under rate schedule STL will have the above charge applied per lighting unit, per month.

PROVISIONS:

The charges set forth in this Rider recover costs associated with the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA. Any additional costs associated with expansion of the Ohio Site Deployment or the implementation of any additional advanced metering or grid modernization infrastructure in Ohio including, but not limited to, Commission directed, legislatively mandated or Company initiated and Commission approved infrastructure expansion will be collected through this Rider.

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. This Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI.

Pursuant to the settlement in Case No. 16-0481-EL-UNC, et. al, approved by the Commission on July 17, 2019, the Companies submit the narrative below which will:

1. identify the relevant foundational standards associated with implementing the necessary information technology and software platform systems needed to support the investment;
2. describe how interoperability will be ensured within each system and across systems; and
3. describe how investments, both new and old, will be leveraged to ensure that benefits associated with these investments are realized.

Foundational standards are key to implementing the Information technology (IT) and software platform systems needed to support the functional requirements of Grid Mod I investments. The functional requirements for advanced metering infrastructure (AMI) as part of Grid Mod I include: a scalable meter data management system (MDMS); the capability to support generally accepted standards; and certain data access enhancements for customers and competitive retail suppliers, such as the ability to use the data in market settlements as well as support customer access to data through a portal.

For Distribution Automation (DA), the functional requirement is the ability to contribute towards reliability improvements through remote fault isolation and diagnostics, automated feeder switching, outage status monitoring and notification and optimized restoration. These functions will be performed in a way that ensures safe, reliable operations. For Integrated Volt Var Controls (IVVC), the functional requirement is to support automated voltage regulation, conservation voltage reduction, real-time load balancing and automated power factor corrections. The Advanced Distribution Management System (ADMS) will be designed to support a broad range of current and future distribution management and optimization, including but not limited to: fault isolation and system restoration, integration of distributed energy resources, use of the information in distribution planning efforts, more efficient utility operation and planning actions, and integration with existing and future utility investments, including MDMS, and SCADA.

The foundational operational standards required for IT and software platform systems to support these functional requirements will include standardized configurations, processes, field equipment and field data. The foundation for these systems is an effective supply chain selection process that ensures the system will meet necessary IT and cyber security requirements. The Companies' platform implementations must follow a predefined application development methodology that includes project definition, requirements analysis, design/construct test, implementation and post implementation. Systems must adhere to an IT change control process where changes must be authorized, tested in a lower level environment where it is determined if they function as intended, and then approved to be moved into production.

One of the requirements that will be articulated in the application design review and supply chain process for these systems is interoperability. Integration requirements are defined, tracked, and tested before they are put into production. They are also scrutinized to ensure compliance with cyber security requirements. Once integrations are implemented, they will be monitored in the Smart Grid or Smart Meter operations center, and in the event of failure or malfunction, appropriate action(s) will be taken based upon impact and severity. For the Grid Mod I applications, the ADMS helps to ensure interoperability, as distribution system operators use the ADMS and its connection to the other smart grid devices such as SCADA enabled equipment or Automated Meter Infrastructure to gain visibility and control over the distribution system. Examples of interoperability across technologies as part of Grid Mod I deployment include: the integration of substation SCADA points into the ADMS; the integration of smart meter information into the ADMS; the availability of end use voltage information through the AMI meters that can be utilized to support the IVVC deployment; and the integration of information from the MDMS to end use customers and CRES providers.

In deploying Grid Mod I investments, the Companies will rely on the considerable knowledge and experience gained in The Cleveland Electric Illuminating Company pilot area and deployment of similar investments by their affiliate utilities in PA, and will leverage the integration of new and existing equipment. As part of Grid Mod I, the Companies will deploy new smart grid end devices such as reclosers, line regulators and capacitors, and utilize previously installed SCADA points, to modernize and expand situational awareness and control across the system through DA. Existing equipment may be repositioned on the circuit, and new equipment may be added to automate and modernize the circuit as part of DA or IVVC deployment. Further, the Companies will install new AMI meters and associated infrastructure, which will be integrated with both existing and new IT systems. The ADMS is a new system that will support the other Grid Mod I investments and integrate with both existing and new IT systems and platforms. The Companies will leverage both their existing communication network and new infrastructure to support the Grid Mod I investments.

The Companies expect that the Grid Mod I investments will provide substantial benefits to customers. DA will improve reliability during both storm and blue-sky events. IVVC allows the Companies to manage the voltage on a circuit with the ability to reduce voltage, resulting in energy and capacity savings to customers, and corresponding reductions in carbon emissions. AMI improves the accuracy of billing information, thereby reducing the number of estimated meter reads. AMI also provides more granular usage information to customers and CRES providers, which is expected to improve customers' understanding of their energy usage and result in new rate offerings, both of which could result in lower usage and corresponding reductions in carbon emissions. Further, AMI can be integrated with the other smart grid technologies to provide outage information to improve service restoration efforts. The ADMS will integrate with the Grid Mod I technologies and enables the Grid Mod I benefits to be realized by customers.

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Summary: Tariff Update of Rider AMI electronically filed by Karen A Sweeney on behalf of The Toledo Edison Company and Fanelli, Santino L. Mr.