BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of)			
Standard Service Offer Generation as Part)	Case No.	16-776-EL-UNC	,
of the Fourth Electric Security Plan for)			
Customers of Ohio Edison Company, The)			
Cleveland Electric Illuminating Company,)			
and The Toledo Edison Company)			

MOTION TO ADJUST SSO AUCTION SCHEDULE AND MOTION IN SUPPORT OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY AND THE TOLEDO EDISON COMPANY

Pursuant to the Finding and Order of the Public Utilities Commission of Ohio ("Commission") issued July 15, 2020 ("Finding and Order"), Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the "Companies") hereby submit their plan to adjust their auction schedules for their Fall 2020 and Spring 2021 Standard Service Offer ("SSO") competitive bid auctions to substitute a 12-month product for the current, planned products under their approved electric security plan. A memorandum in support of this Motion is attached.

Respectfully submitted

/s/ Robert M. Endris
Robert M. Endris (0089886)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 384-5728
(330) 384-3875 (fax)
rendris@firstenergycorp.com

MEMORANDUM IN SUPPORT

I. INTRODUCTION

On July 15, 2020, the Commission issued a Finding and Order directing the Companies and other electric distribution utilities in Ohio to adjust their upcoming Fall 2020 and Spring 2021 SSO procurement auction products in recognition that the PJM base residual auction ("BRA") for capacity had not yet been held for the 2022/2023 delivery year. Specifically, part a of paragraph 35 of the Finding and Order directs the Companies to:

a. Submit a plan to change the current auction scheduled for Fall 2020 and Spring 2021 to substitute a 12-month product for the current, planned products

This directive for modification is independent of any other directive in the Finding and Order. The Companies hereby consent to this modification and submit the following plan to carry out the Commission's directive.¹

II. ARGUMENT

The Companies currently have all of their major milestone events mapped out for their Fall 2020 and Spring 2021 SSO procurement auctions, scheduled for October 5, 2020 and January 26, 2021, respectively.² The Companies delayed by seven days their first informational session for the Fall 2020 auction in order to better align the communication materials for that session with this plan. All other key dates remain the same as planned, tracking closely with well-known schedules in previous successful auctions.

¹ The Companies have exercised and continue to reserve their right to challenge other directives in the Finding and Order through Application for Rehearing filed August 14, 2020.

² See https://www.firstenergycbp.com/Calendar.aspx.

The current approved auction schedules for Fall 2020 and Spring 2021 include the laddering of 36-month products with 12-month products. More specifically, in each of these two auctions the Companies are scheduled to procure 17 "slices" of the SSO supply ("tranches") by suppliers offering bids to supply 36 months of non-shopping customers' needs at a single price. The remaining 16 tranches in each of these auctions are already scheduled to be 12-month products. Under the Companies' plan, the current 36-month product in each of the Fall 2020 and Spring 2021 auctions will be substituted with 12-month products. Thus, all 33 tranches to be procured in each of the Fall 2020 and Spring 2021 auctions now will reflect 12-month products for the delivery year June 1, 2021 through May 31, 2022. With these changes, the Companies will fully satisfy their SSO obligation for this delivery year, as shown in the table below.

Auction Date	Current Approved Schedule		Revised Schedule under Plan	
Auction Date	Tranches	Delivery Period	Tranches	Delivery Period
October 2019	17	June 2020 - May 2022	17	June 2020 - May 2022
January 2020	17	June 2020 - May 2022	17	June 2020 - May 2022
October 2020	16	June 2021 - May 2022	33	June 2021 - May 2022
October 2020	17	June 2021 - May 2024		
January 2021	16	June 2021 - May 2022	33	June 2021 - May 2022
January 2021	17	June 2021 - May 2024		
	100		100	

All auction communications materials, including the Companies' website, will reflect this modification, including that it is subject to Commission approval. Other than this substitution to change to 12-month products in the Fall 2020 and Spring 2021 auctions, there are no other changes necessary to any of the Companies' approved auction documents as a result of this plan.

In order to meet the Companies' auction schedule, the Companies further request a ruling on this motion by September 9, 2020, which is the date the Companies' auction manager, CRA Associates, is scheduled to issue the minimum and maximum starting prices for the Fall 2020

auction. This announcement provides important parameters for potential auction participants to guide their decisions, and meeting this schedule will contribute to the success of the auction.

III. CONCLUSION

In accordance with the July 15, 2020 Finding and Order, the Companies' respectfully request the Commission issue an Entry by September 9, 2020, granting the Companies' Motion to adjust their SSO procurement auction schedule to substitute 12-month auction products for the currently approved 36-month products in the upcoming October 2020 and Spring 2021 auctions.

Respectfully submitted

/s/ Robert M. Endris
Robert M. Endris (0089886)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 384-5728
(330) 384-3875 (fax)
rendris@firstenergycorp.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion to Adjust Auction of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 21st day of August 2020. The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on counsel for all parties, and a courtesy copy has been served on the following persons.

/s/ Robert M. Endris
Robert M. Endris (0089886)
FIRSTENERGY SERVICE COMPANY
Attorney for Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The Toledo
Edison Company

talexander@calfee.com khelmeyer@calfee.com Jeanne.kingery@duke-energy.com Rocco.dascenzo@duke-energy.com Larisa.vaysman@duke-energy.com Michael.schuler@aes.com mkurtz@bkllawfirm.com kboehm@bkllawfirm.com jkylercohn@bkllawfirm.com stnourse@aep.com Christopher.healey@occ.ohio.gov William.michael@occ.ohio.gov glpetrucci@vorys.com fykes@whitt-sturtevant.com joe.oliker@igs.com john.jones@ohioattorneygeneral.com Gregory.price@puco.ohio.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/21/2020 1:17:26 PM

in

Case No(s). 16-0776-EL-UNC

Summary: Motion Motion to Adjust SSO Auction of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company electronically filed by Mr Robert M Endris on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company