



## Affidavit in Support of Motion for Protective Order.docx

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 Created: February 26, 2021 10:05:32 -8:00  
 Pages: 4  
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### E-Signature Summary

**E-Signature 1: Joseph M. Storsin Jr. (JMS)**

February 26, 2021 10:20:04 -8:00 [0C226671364C] [148.108.98.32]  
 jstorsin@firstenergycorp.com (Principal) (Personally Known)

**E-Signature Notary: Matthew J. Albright (MJA)**

February 26, 2021 10:20:04 -8:00 [49C821627EB2] [173.89.93.221]  
 malbright@firstenergycorp.com  
 I, Matthew J. Albright, did witness the participants named above electronically sign this document.



BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Determination of the )  
Existence of Significantly Excessive Earnings )  
for 2017 Under the Electric Security Plans of ) Case No. 18-857-EL-UNC  
Ohio Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo Edison )  
Company. )

In the Matter of the Determination of the )  
Existence of Significantly Excessive Earnings ) Case No. 19-1338-EL-UNC  
for 2018 Under the Electric Security Plan of )  
Ohio Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo Edison )  
Company. )

In the Matter of the Determination of the )  
Existence of Significantly Excessive Earnings ) Case No. 20-1034-EL-UNC  
for 2019 Under the Electric Security Plan of )  
Ohio Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo Edison )  
Company. )

In the Matter of the Quadrennial Review )  
Required by R.C. 4928.143(E) for the Electric ) Case No. 20-1476-EL-UNC  
Security Plan of Ohio Edison Company, The )  
Cleveland Electric Illuminating Company, and )  
The Toledo Edison Company. )

**AFFIDAVIT OF JOSEPH M. STORSIN, JR. IN SUPPORT OF  
MOTION FOR PROTECTIVE ORDER**

STATE OF OHIO )  
 ) SS:  
COUNTY OF SUMMIT )

Joseph M. Storsin, Jr., being first duly sworn in accordance with the law, deposes and  
states:

1. I am over 18 years of age and have personal knowledge of the matters set forth  
herein.



2. I am employed by FirstEnergy Service Company as Assistant Controller – FirstEnergy Utilities for FirstEnergy Corp. and a number of its subsidiary companies, including Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, “Companies”).

3. I have reviewed and am familiar with the Schedules JMS-1 and JMS-2 to my Testimony and Schedules TMA-1, TMA-2 and TMA-3 to the Testimony of Tracy M. Ashton filed under seal in the above-captioned proceedings (collectively, the “Confidential Schedules”).

4. Schedules JMS-1 and JMS-2 contain projected net income and balance sheet information for the Companies based on the Companies’ current financial forecast. Schedules TMA-1, TMA-2 and TMA-3 rely on Schedules JMS-1 and JMS-2 to calculate prospective earnings and common equity for calendar years 2021 – 2024 for the Companies. All projected data are redacted from the public filings in these proceedings.

5. The information in the Confidential Schedules is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The Companies have treated all of the information in the Confidential Schedules that has been redacted as proprietary, confidential business information and as a trade secret. The information in the Confidential Schedules is not known to the public or those outside the Companies. The Companies will only provide this information to others under an appropriate protective agreement.

6. Further, in the ordinary course of business of the Companies, the information in the Confidential Schedules is treated as proprietary and confidential by the Companies and their employees. Within the Companies, the financial information in the Confidential Schedules is not generally accessible by employees of the Companies, except for those employees who helped create it or need to rely on it to carry out their responsibilities. All employees are subject to



nondisclosure agreements prohibiting the disclosure of this type of financial information, except as otherwise authorized. While the Companies' parent company discloses specific financial information in its public reporting on a consolidated basis, the information in the Confidential Schedules is not disclosed to anyone without proper safeguards.

7. The information in the Confidential Schedules also derives actual, independent value as a result of it not being generally known or readily ascertainable by those who might otherwise obtain economic value from its disclosure or use, such as competitors, suppliers or investors. This information could, if disclosed, be used by investors to make decisions regarding the purchase or sale of FirstEnergy Corp. stock, which would, in turn, affect the price of such stock. The public disclosure of this information would have a real effect on the financial position of the Companies, including potentially affecting the price of publicly traded stock and revealing proprietary details of the Companies' growth and operations strategies. Members of the public would not be able to obtain and compile this financial information, or to duplicate it, at the level of detail provided in the Confidential Schedules.

8. Because the Confidential Schedules contain forecasted financial information of the Companies, they are material nonpublic information under Regulation FD, 17 C.F.R. 243. As such, the release of this sensitive, nonpublic financial information could implicate disclosure requirements under Regulation FD, as well as other federal securities law concerns.

FURTHER AFFIANT SAYETH NAUGHT.

02/26/2021

Joseph M. Storsin Jr.  
Signed on 2021/02/26 10:20:04 -0500

Joseph M. Storsin, Jr.



Sworn to before me and subscribed in my presence, this 26th day of February, 2021.



Notary Public



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

**Commission of Ohio Docketing Information System on**

**3/1/2021 4:50:09 PM**

**in**

**Case No(s). 18-0857-EL-UNC, 19-1338-EL-UNC, 20-1034-EL-UNC, 20-1476-EL-UNC**

Summary: Affidavit in Support of Motion for Protective Order electronically filed by Ms. Margaret Dengler on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company