## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Steven Painter	)	
Complainant	)	
v.	)	Case No. 21-0236-EL-CSS
Ohio Edison Company	)	
Respondent	)	

## OHIO EDISON COMPANY'S REPLY MEMORANDUM TO OHIO EDISON COMPANY'S MOTION TO STAY

On March 31, 2021, Ohio Edison Company ("Ohio Edison" or the "Company") filed its Motion to Stay and Memorandum in Support. On April 9, 2021, Complainant filed correspondence disagreeing with Ohio Edison's Motion to Stay. As discussed in the Memorandum in Support, Ohio Edison's request for a stay of the proceedings involved in this matter was primarily due to an ongoing investigation within the Company's claims department involving Complainant and the same issues presented in Complainant's Complaint. A temporary stay was in the best interest of efficiency and economy, as Complainant's allegations could have potentially been resolved through the claims process. With this Reply Memorandum, Ohio Edison advises the Commission that Ohio Edison's claims department has concluded its investigation of the issues Complainant directly submitted to the Company.

Following thorough investigation, Ohio Edison's claims department denied Complainant's claim as of April 12, 2021. Ohio Edison is prepared to proceed with this case at this time and will be filing an Answer to Complainant's Complaint contemporaneously with this Reply.

## Respectfully submitted,

/s/Kristen M. Fling

Kristen M. Fling (0099678)
Counsel of Record
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, Ohio 44308
(330) 606-8087
kfling@firstenergycorp.com.

/s/Christine E. Watchorn

Christine E. Watchorn (0075919) FIRSTENERGY SERVICE COMPANY 100 E. Broad Street, Suite 2225 Columbus, Ohio 43215 (614) 437-0183

cwatchorn@firstenergycorp.com

Attorneys for Respondent Ohio Edison Company

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing Reply Memorandum to Ohio Edison Company's Motion to Stay was filed on the Public Utilities Commission of Ohio's Docketing Information System. The PUCO's e-filing system will electronically serve notice of the filing of this document on all parties of record in this proceeding. A service copy has been sent by U.S. Mail on this 16<sup>th</sup> day of April 2021 to the Complainant at the following address:

Mr. Steven D. Painter 261 Cottswold Drive Delaware, Ohio 43015

/s/Kristen M. Fling
Kristen M. Fling
Attorney for Respondent Ohio Edison Company

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

4/16/2021 9:45:18 AM

in

Case No(s). 21-0236-EL-CSS

Summary: Memorandum OHIO EDISON COMPANY'S REPLY MEMORANDUM TO OHIO EDISON COMPANY'S MOTION TO STAY electronically filed by Ms. Kristen M Fling on behalf of Ohio Edison Company