



## Affidavit of Joseph Storsin 4-20.docx

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### E-Signature Summary

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

April 20, 2021 09:19:48 -8:00 [14FDD7DE353F] [148.108.98.34]  
jstorsin@firstenergycorp.com (Principal) (Personally Known)

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

April 20, 2021 09:19:48 -8:00 [423051EAFDF5] [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 ) Case No. 18-857-EL-UNC  
2017 Under the Electric Security Plans 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 for ) Case No. 19-1338-EL-UNC  
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 for ) Case No. 20-1034-EL-UNC  
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-Supplemental and JMS-2-Supplemental to my Supplemental Testimony and Schedules TMA-1-Supplemental, TMA-2-Supplemental, and TMA-3-Supplemental to the Second Supplemental Testimony of Tracy M. Ashton filed under seal in the above-captioned proceedings (collectively, the "Confidential Schedules").

4. Schedules JMS-1-Supplemental and JMS-2-Supplemental contain projected net income and balance sheet information for each of the Companies, on an individual basis, based on a financial forecast of the Companies. Schedules TMA-1-Supplemental, TMA-2-Supplemental, and TMA-3-Supplemental rely on Schedules JMS-1-Supplemental and JMS-2-Supplemental to calculate prospective earnings and common equity for calendar years 2021 - 2024 for each of 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.

Joseph M. Storsin Jr.  
Signed on 2021/04/20 09:19:48 -8:00



Joseph M. Storsin, Jr.

Sworn to before me and subscribed in my presence, this 20th day of April, 2021.



A handwritten signature of Matthew J Albright in a red box. Below the signature, the text "Signed on 2021/04/20 09:19:48 -000" is visible.

Notary Public



**CERTIFICATE OF SERVICE**

I hereby certify that Ohio Edison Company, The Cleveland Electric Illuminating Company, and the Toledo Edison Company filed the foregoing document electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 20<sup>th</sup> day of April 2021. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Mark T. Keaney  
*Attorney for Ohio Edison Company, The  
Cleveland Electric Illuminating Company, and  
The Toledo Edison Company*

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

**Commission of Ohio Docketing Information System on**

**4/20/2021 2:11:28 PM**

**in**

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

Summary: Affidavit Affidavit of Joseph M. Storsin, Jr. in Support of Motion for Protective Order electronically filed by Mark T Keaney on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company