

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2020 Review of the	:	
Delivery Capital Recovery Rider of	:	Case No. 20-1629-EL-RDR
Ohio Edison Company, The Cleveland	:	
Electric Illuminating Company, and	:	
The Toledo Edison Company.	:	

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**MOTION FOR EXTENSION OF TIME  
TO SUBMIT DRAFT AUDIT REPORT TO STAFF  
AND TO FILE FINAL AUDIT REPORT WITH COMMISSION,  
AND REQUEST FOR EXPEDITED RULING**

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The Staff of the Public Utilities Commission of Ohio (Staff) moves for an extension of the deadlines provided in the Request for Proposal (RFP) that was issued in this case. Specifically, Staff requests that the deadline for the Draft Audit Report to be presented to Staff be extended from May 5, 2021 to June 21, 2021, and that the Final Audit Report to be filed be extended from May 17, 2021 to July 6, 2021.

Staff further requests that the Commission grant its motion on an expedited basis pursuant to Ohio Adm. Code 4901-1-12(C) and certifies both that no party has objected to the issuance of an immediate ruling or to the requested extension of the deadlines identified above. (Although the Office of the Ohio Consumers' Counsel has not objected, neither has it, as of the time of filing this motion, granted its assent.)

The grounds for this motion are set forth in the accompanying memorandum in support.

Respectfully submitted,

**David Yost** (0056290)  
Attorney General

**John H. Jones** (0051913)  
Section Chief

*/s/ Werner L. Margard III*

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## MEMORANDUM IN SUPPORT

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This case involves the annual audit of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, FirstEnergy) for compliance with their approved Delivery Capital Recovery Rider (Rider DCR). By Entry dated December 16, 2020, the Public Utilities Commission of Ohio (Commission) selected Blue Ridge Consulting Services, Inc. (Blue Ridge or Auditor) to conduct the audit services necessary to assist the Commission with the 2020 annual audit of FirstEnergy's Rider DCR costs. That Entry incorporated the terms and the conditions of the Request for Proposal (RFP) No. RA20-CA-3 into the contract between FirstEnergy and Blue Ridge, and established May 5, 2021 as the deadline for a Draft Audit Report to be presented to Staff, and May 17, 2021 as the deadline for the Final Audit Report to be filed with the Commission, pursuant to provision "IV. Timeline" in the RFP at 4.

On March 8, 2021, Staff filed a letter in this docket requesting that the Commission expand the scope of the audit. Specifically, Staff noted the disclosure made in the 10K filed by FirstEnergy Corp. on February 18, 2021 concerning "certain transactions . . . that were either improperly classified, misallocated . . . or lacked supporting documentation". Staff requested that the Commission direct Blue Ridge to review the disclosed transactions to determine whether funds collected from ratepayers were used to pay the vendors and, if so, whether the funds associated with those

payments should be returned to ratepayers in this or an alternative proceeding. By Entry of March 10, 2021, the Commission directed Blue Ridge to expand the scope of the audit to include payments made to a number of vendors, recently disclosed by FirstEnergy Corp. The Entry adopted the terms and conditions of the RFP (paragraph 10). The Commission also recognized that the expansion of the audit may require additional time and resources. Blue Ridge accepted the Commission's expansion of the audit.

Due to the expansion of the audit, Blue Ridge has advised Staff that it needs additional time to complete its review. Based on information known at this time, Blue Ridge believes that it will need until June 21, 2021 to present its Draft Audit Report to Staff, and an additional two (2) weeks, or until July 6, 2021, to file its Final Audit Report. Additional requests for extension are not anticipated, but may be necessary.

Ohio Adm. Code 4901-1-12(C) allows requests that the Commission consider a motion on an expedited basis. Inasmuch as the current deadline for the Draft Audit Report is less than a week away, Staff respectfully requests and expedited ruling that the deadline be extended as requested in this motion.

Respectfully submitted,

**David Yost** (0056290)  
Attorney General

**John H. Jones** (0051913)  
Section Chief

*/s/ Werner L. Margard III*

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension of Time to Submit Draft Audit Report to Staff and to File Final Audit Report with Commission, and Request for Expedited Ruling, and Memorandum in Support** was served by regular U.S. mail, postage prepaid, electronic mail, or hand-delivered, upon the following parties of record, this 30<sup>th</sup> day of April, 2021.

/s/ Werner L. Margard III

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*On behalf of the Ohio Edison Company,  
The Cleveland Electric Illuminating  
Company, and The Toledo Edison  
Company*

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

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**Case No(s). 20-1629-EL-RDR**

Summary: Motion for Extension of Time to Submit Draft Audit Report to Staff and to File Final Audit Report with Commission, and Request for Expedited Ruling, and Memorandum in Support electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO