

[illegible]

Pursuant to Rules 4901-1-16 through 4901-1-22 of the Ohio Administrative Code and in accordance with Ohio Rules of Civil Procedure 26, 33, 34, and 36, Respondent Ohio Edison Company (“Ohio Edison”) submits its amended and supplemental responses and objections to Complainant’s first requests for admission, interrogatories, and requests for production of documents, stating as follows:

Ohio Edison incorporates the following objections into each response below, as if fully restated therein.

2. Ohio Edison objects to the definition of “Documents” and “Documentation” to the extent it seeks to impose obligations on Ohio Edison that are broader than, or inconsistent

with, those imposed by the rule of the Ohio Administrative Code and the Ohio Rules of Civil Procedure. Ohio Edison construes the term “document” to be synonymous in meaning and equal in scope to the usage of the term “documents” in Rule 34(A) of the Ohio Rules of Civil Procedure.

3. Ohio Edison objects to the definition of “Communication” as overbroad, unduly burdensome, and vague and ambiguous, and Ohio Edison further objects to the extent that the definition seeks to impose obligations on Ohio Edison that are broader than, or inconsistent with, those imposed by the rule of the Ohio Administrative Code and the Ohio Rules of Civil Procedure. For example, Complainant defines “Communication” to include the transmission of information by “oral” or “otherwise perceptible means” and therefore unreasonably purports to require Ohio Edison to describe in detail communications that are not contained in any document. Further, the definition states that a request “seeking the identity of a communication . . . encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication” and therefore unreasonably purports to place an undue burden on Ohio Edison to identify any documents or communications having any “nexus” or containing any “explicit or implicit” reference to the subject matter of a communication.

4. Ohio Edison objects to the definition of “You,” “Your,” or “Yourself” as overbroad and unduly burdensome because it unreasonably purports to require Ohio Edison to provide information on behalf of any “present or former director, officer, agent, contractor, consultant, advisor, employee, partner, or joint venturer” and is unlimited as to time. Ohio Edison construes the terms “You,” “Your,” and “Yourself” to refer only to Ohio Edison Company.

5. Ohio Edison objects to Complainant's "instructions" for invoking privilege to the extent they seek to impose requirements on Ohio Edison that are broader than, or inconsistent with, those imposed by the Ohio Administrative Code or by the Ohio Rules of Civil Procedure. Should Ohio Edison withhold any document on the basis of any applicable privilege, immunity, or protection, Ohio Edison will provide the information required by Ohio Rule of Civil Procedure 26(B)(6)(a).

6. A statement that documents will be produced is not intended to suggest that responsive documents exist within Ohio Edison's possession, custody, or control; nor is it intended to suggest that Ohio Edison will search every electronic and paper file within its possession, custody, or control, because that exercise would be unduly burdensome and prohibitively expensive and is not required under the rules. A statement that documents will be produced means that Ohio Edison will search for documents in those places where Ohio Edison reasonably anticipates they may be located and, if located and not subject to any privilege, Ohio Edison will make them available for inspection and copying at a mutually agreeable time and place.

#### **RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSION**

**RFA-1:** Admit that the Property is within Ohio Edison's service territory.

**RESPONSE:** Admitted.

**RFA-2:** Admit that Ohio Edison is required to provide service to the owner of the Property if the owner of the Property requests service and meets all other Commission approved prerequisite criteria for service.

**RESPONSE:** Ohio Edison objects to this request as vague and ambiguous. Specifically, the phrase "meets all other Commission approved prerequisite criteria for service" is undefined and

subject to multiple interpretations, and Ohio Edison can therefore neither admit nor deny the request. Ohio Edison further objects to this request as improper under Rule 4901-1-22, O.A.C., because the request seeks Ohio Edison's legal position on a hypothetical question, rather than an admission regarding "a specific matter," as required by Rule 4901-1-22.

**RFA-3:** Admit that Enyart contacted Ohio Edison on January 26, 2018 and requested service to the property.

**RESPONSE:** Admitted.

**RFA-4:** Admit that Ohio Edison could have provided service to Enyart after Enyart's January 26, 2018 request for service without first installing any new meters or other equipment on the Property.

**RESPONSE:** Admitted.

**RFA-5:** Admit that Ohio Edison was providing service to the Property on January 26, 2018 on the prior Property owner's account.

**RESPONSE:** Admitted.

**RFA-6:** Admit that on or between January 26, 2018 and January 29, 2018, the service being provided to the Property under the prior owner's account was terminated.

**RESPONSE:** Ohio Edison admits that, at the prior owner's request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

**AMENDED RESPONSE:** Ohio Edison admits that, at the prior owner's request for a move out effective on January 26, 2018, Ohio Edison completed the prior owner's move-out request at approximately 9:52 a.m. on January 29, 2018, with an effective date of January 26, 2018.

**RFA-7:** Admit that once service to the Property on the prior owner's account was terminated, the Property was without service.

**RESPONSE:** Ohio Edison objects to this request as vague and ambiguous because the phrase "the Property was without service" is unlimited as to time and is therefore subject to multiple interpretations. Subject to and without waiving any objections, Ohio Edison admits that, at the prior owner's request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

**AMENDED RESPONSE:** Ohio Edison objects to this request as vague and ambiguous because the phrase "the Property was without service" is unlimited as to time and is therefore subject to multiple interpretations. Subject to and without waiving any objections, denied.

**RFA-8:** Admit that Ohio Edison failed to provide service to the Property within three business days of Enyart's request for service on January 26, 2018.

**RESPONSE:** Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 within three business days of Enyart's request for service on January 26, 2018. Ohio

Edison admits that it did not provide service to Meter 680628666 within three business days of Enyart's request for service on January 26, 2018.

***AMENDED RESPONSE:*** Denied.

**RFA-9:** Admit that Ohio Edison failed to provide service to the Property within one business day of Enyart's request for service on January 26, 2018.

**RESPONSE:** Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 within one business day of Enyart's request for service on January 26, 2018. Ohio Edison admits that it did not provide service to Meter 680628666 within one business day of Enyart's request for service on January 26, 2018.

***AMENDED RESPONSE:*** Denied.

**RFA-10:** Admit that the Ohio Edison meter at the Property is capable of starting service remotely.

**RESPONSE:** Ohio Edison objects to this request as vague and ambiguous because there are two meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, Ohio Edison denies that Meter 680628666 at 50 Newton St., Norwalk, Ohio 44857 is capable of starting service remotely.

**AMENDED RESPONSE:** Ohio Edison objects to this request as vague and ambiguous because there are three meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, denied.

**RFA-11:** Admit that Ohio Edison did not provide service to the Property under Enyart's account until February 1, 2018.

**RESPONSE:** Ohio Edison admits this request in part and denies this request in part. Two meters are located at 50 Newton St., Norwalk, Ohio 44857, each serving a different unit. Meter 674019737 is for 50 Newton St. U1, Norwalk, Ohio 44857. Meter 680628666 is for 50 Newton St. UB, Norwalk, Ohio 44857. Ohio Edison denies that it did not provide service to Meter 674019737 under Enyart's account until February 1, 2018. Ohio Edison admits that it did not provide service to Meter 680628666 under Enyart's account until February 1, 2018.

**AMENDED RESPONSE:** Denied.

**RFA-12:** Admit that Ohio Edison did not notify Enyart that Ohio Edison would not provide service within three business days of his request.

**RESPONSE:** Ohio Edison denies this request to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided within three business days of Enyart's request and determined not to notify Enyart. Ohio Edison further denies this request to the extent it implies that Ohio Edison determined that it "would not provide service within three business days of [Enyart's] request." Ohio Edison admits that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666.

**AMENDED RESPONSE:** Ohio Edison objects to this Request because it incorrectly assumes that Ohio Edison did not provide service to the property within three business days of Enyart's request. Ohio Edison began providing service under Enyart's accounts to the property on January 29, 2018, the first business day after Enyart's request for service. Ohio Edison can neither truthfully admit nor deny that Ohio Edison "did not notify Enyart that Ohio Edison would not provide service within three business days of his request," because Ohio Edison did, in fact, provide service within three business days.

**RFA-13:** Admit that Ohio Edison is subject to the Commission's jurisdiction.

**RESPONSE:** Admitted.

**RFA-14:** Admit that Ohio Edison is an electric light company.

**RESPONSE:** Admitted.

**RFA-15:** Admit that Ohio Edison is subject to the Commission's Rules governing electric light companies.

**RESPONSE:** Admitted.

**RFA-16:** Admit that Ohio Edison did not notify Enyart that Ohio Edison would not provide service within one business day of his request.

**RESPONSE:** Ohio Edison denies this request to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided within one business day of Enyart's request and determined not to notify Enyart. Ohio Edison further denies this request to the extent it implies that Ohio Edison determined that it "would not provide service within one business day



of [Enyart's] request.” Ohio Edison admits that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666.

**AMENDED RESPONSE:** Ohio Edison objects to this Request because it incorrectly assumes that Ohio Edison did not provide service to the property within one business day of Enyart's request. Ohio Edison began providing service under Enyart's accounts to the property on January 29, 2018, the first business day after Enyart's request for service. Ohio Edison can neither truthfully admit nor deny that Ohio Edison “did not notify Enyart that Ohio Edison would not provide service within one business day of his request,” because Ohio Edison did, in fact, provide service within one business day.

**RFA-17:** Admit that Ohio Edison violated the minimum service levels O.A.C 4901:1-10-09 required Ohio Edison to provide to Enyart.

**RESPONSE:** Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service levels O.A.C[.] 4901:1-10-09 required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

**RFA-18:** Admit that Ohio Edison violated the minimum service levels O.A.C 4901:1-10-09 (A) through O.A.C. 4901:1-10-09 (A)(1)(c) required Ohio Edison to provide to Enyart.

**RESPONSE:** Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service levels O.A.C[.] 4901:1-10-09 A through O.A.C. 4901:1-10-09 (A)(1)(c) required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by these provisions of Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

**RFA-19:** Admit that Ohio Edison violated the minimum service level O.A.C 4901:1-10-09 (A)(3) required Ohio Edison to provide to Enyart.

**RESPONSE:** Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. The phrase “the minimum service level O.A.C[.] 4901:1-10-09 (A)(3) required Ohio Edison to provide to Enyart” is vague, ambiguous, and subject to multiple interpretations. Further, information concerning the system-wide performance standards identified by Rule 4901:1-10-09, O.A.C., and data related to those standards are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any objections, denied.

**RFA-20:** Admit that Ohio Edison’s failure to provide power during subzero temperatures resulted in the frozen pipes and property damage alleged in the Complaint.

**RESPONSE:** Ohio Edison objects to this request because it seeks information concerning Enyart's alleged property damages, which are not properly before the Commission since the Commission has no jurisdiction to award damages to Enyart. Subject to and without waiving any objections, denied.

***AMENDED RESPONSE:*** Ohio Edison objects to this request because it seeks information concerning Enyart's alleged property damages, which are not properly before the Commission since the Commission has no jurisdiction to award damages to Enyart. Ohio Edison further objects to this request because it incorrectly assumes that Ohio Edison failed to provide power to Enyart's property. Subject to and without waiving any objections, denied.

**RFA-21:** Admit that Ohio Edison violated O.R.C. 4928.11.

**RESPONSE:** Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further objects to this request as improper under Rule 4901-1-22, O.A.C., because the request seeks Ohio Edison's legal position on a hypothetical question, rather than an admission regarding "a specific matter," as required by Rule 4901-1-22.

***AMENDED RESPONSE:*** Ohio Edison objects to this request as vague, ambiguous, overbroad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further objects to this request as improper under Rule 4901-1-22, O.A.C., because the request seeks Ohio Edison's legal position on a hypothetical question, rather than an admission

regarding “a specific matter,” as required by Rule 4901-1-22. Subject to and without waiving any objections, denied.

## **RESPONSES AND OBJECTIONS TO INTERROGATORIES**

**INT-1:** Identify each person who provided any answer or response, or assisted in answering or responding to these Combined Discovery Requests.

**RESPONSE:** Ohio Edison objects to this interrogatory because it seeks information protected by the attorney-client privilege and work-product doctrines. Subject to and without waiving any objections, Ohio Edison states that its responses to Complainant's discovery requests were prepared by counsel.

**INT-2:** Is Ohio Edison capable of remotely starting and stopping the meter at the Property?

**RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because there are two meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, Ohio Edison states that Meter 680628666 at 50 Newton St., Norwalk, Ohio 44857 is not capable of starting and stopping service remotely.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because there are three meters at 50 Newton St., Norwalk, Ohio 44857. Subject to and without waiving any objections, Ohio Edison states that the meters at 50 Newton St., Norwalk, Ohio 44857 are not capable of starting and stopping service remotely.

**INT-3:** Did Ohio Edison need to install additional equipment of any kind to provide service to the Property as of January 26, 2018?

**RESPONSE:** No.

**INT-4:** Why did Ohio Edison fail to provide service to the Property within three business days of Enyart's request?

**RESPONSE:** Ohio Edison objects to this interrogatory because it incorrectly assumes that Ohio Edison "fail[ed] to provide service" to the property at 50 Newton St., Norwalk, Ohio 44857 within three business days of Enyart's request. Subject to and without waiving any objections, Ohio Edison states that it began providing service to Meter 674019737 under Enyart's account on January 29, 2018, which was the first business day following Enyart's request for service. Ohio Edison further states that the delay in establishing service to Meter 680628666 under Enyart's account from January 29, 2018 to February 1, 2018 was due to a system error.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory because it incorrectly assumes that Ohio Edison "fail[ed] to provide service" to the property at 50 Newton St., Norwalk, Ohio 44857 within three business days of Enyart's request. Subject to and without waiving any objections, Ohio Edison states that it did not fail to provide service to Enyart's property within three business days of his request. Service to the property under Enyart's accounts began on January 29, 2018—the first business day following Enyart's request for service—and has continued since that time.

**INT-5:** What date did Ohio Edison terminate service to the Property on the account for the Owner of the Property immediately preceding Enyart?

**RESPONSE:** At the prior owner's request for a move out effective on January 26, 2018, Ohio Edison blocked service at the meters at 50 Newton St., Norwalk, Ohio 44857 at approximately 9:52 a.m. on January 26, 2018.

**AMENDED RESPONSE:** At the prior owner's request for a move out effective on January 26, 2018, Ohio Edison completed the prior owner's move-out request at approximately 9:52 a.m. on January 29, 2018, with an effective date of January 26, 2018.

**INT-6:** What date did Ohio Edison provide service for the first time to the Property with Enyart as the owner of the Property on the account?

**RESPONSE:** Ohio Edison began providing service to Meter 674019737 under Enyart's account on January 29, 2018. Ohio Edison began providing service to Meter 680628666 under Enyart's account on February 1, 2018.

**AMENDED RESPONSE:** Ohio Edison began providing service to the two meters at the property for which Enyart requested service under his accounts on January 29, 2018.

**INT-7:** How many service installations, that did not require construction of new or additional electric facilities, did Ohio Edison perform in January 2018?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-8:** Of the number provided in response to INT-7 above, how many of those service installations were performed within three business days once Ohio Edison was notified the service location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-9:** Of the number provided in response to INT-7 above, how many of those service installations were performed via meters that could start and stop service remotely?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-10:** Of the number provided in response to INT-9 above, how many of those service installations were performed within one business day after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.



**INT-11:** Of the number provided in response to INT-7 above, how many of those service installations were performed via meters that could not start and stop service remotely?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-12:** Of the number provided in response to INT-11 above, how many of those service installations were performed within three business days after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-13:** Of the number provided in response to INT-7 above, how many of those service installations were from applicants who requested an installation date more than three business days after the original installation request?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-14:** Of the number provided in response to INT-13 above, how many of those service installations were performed by the requested installation date after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-15:** Did Ohio Edison achieve 99% of new installations, requiring no construction of electric facilities, within the required time frames from O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c) for January 2018?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, and overbroad. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper and overbroad.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and harassing. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-16:** How many service installations, that did not require construction of new or additional electric facilities, did Ohio Edison perform in February 2018?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-17:** Of the number provided in response to INT-16 above, how many of those service installations were performed within three business days once Ohio Edison was notified the service location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-18:** Of the number provided in response to INT-16 above, how many of those service installations were performed via meters that could start and stop service remotely?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-19:** Of the number provided in response to INT-18 above, how many of those service installations were performed within one business day after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-20:** Of the number provided in response to INT-16 above, how many of those service installations were performed via meters that could not start and stop service remotely?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio

Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-21:** Of the number provided in response to INT-20 above, how many of those service installations were performed within three business days after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-22:** Of the number provided in response to INT-16 above, how many of those service installations were from applicants who requested an installation date more than three business days after the original installation request?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-23:** Of the number provided in response to INT-22 above, how many of those service installations were performed by the requested installation date after Ohio Edison was notified the location was ready for service and all regulatory and tariff requirements were met?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-24:** Did Ohio Edison achieve 99% of new installations, requiring no construction of electric facilities, within the required time frames from O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c) for February 2018?

**RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, and unduly burdensome. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and harassing. Ohio Edison's system-wide service statistics are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, rendering this interrogatory improper, overbroad, and unduly burdensome.

**INT-25:** What type of service does Ohio Edison provide Enyart at the Property?

**RESPONSE:** Ohio Edison provides electric service to the property at 50 Newtown St., Norwalk, Ohio 44857.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase “type of service” is undefined and subject to multiple interpretations. Subject to and without waiving any objections, Ohio Edison states that it provides electric service to the property at 50 Newton St., Norwalk, Ohio 44857.

**INT-26:** Identify the tariff governing the service Ohio Edison provides Enyart at the Property.

**RESPONSE:** Ohio Edison, Tariff P.U.C.O. No. 11, on file with the Public Utilities Commission of Ohio.

**INT-27:** If Your Response to RFA-17 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

**RESPONSE:** Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-17, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel’s mental impressions, thoughts, and theories.

**INT-28:** If Your Response to RFA-18 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

**RESPONSE:** Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-18, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

**INT-29:** If Your Response to RFA-19 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

**RESPONSE:** Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-19, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

**INT-30:** If Your Response to RFA-20 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

**RESPONSE:** Ohio Edison objects to this interrogatory because it seeks information concerning Enyart's alleged property damages, which are not properly before the Commission since the Commission has no jurisdiction to award damages. Ohio Edison further objects to this



interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-20, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

**INT-31:** If Your Response to RFA-21 above is anything other than an unqualified admission identify all the facts and law that support your denial / partial denial.

**RESPONSE:** Ohio Edison objects to this interrogatory for the reasons set forth in its objections to RFA-21, which are incorporated herein by reference. Ohio Edison further objects to this interrogatory on the ground that it purports to require Ohio Edison to identify every fact, witness, document, and law that Ohio Edison may use to support its legal position. Thus, this interrogatory seeks information protected from disclosure by the work-product doctrine and necessarily would require disclosure of counsel's mental impressions, thoughts, and theories.

**INT-32:** Identify every expert witness you expect or intend to call at the hearing in this matter and the subject matter upon which you expect them to testify.

**RESPONSE:** Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which experts, if any, it expects or intends to call at the hearing in this matter. Ohio Edison will disclose its witnesses in accordance with the procedural schedule.

**SUPPLEMENTAL RESPONSE:** Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which experts it expects or intends to call at the hearing in this matter. Subject to and without waiving any objections, Ohio Edison expects to call Princess Davis as an expert witness to testify at the hearing. Regarding the subject matter of Ms. Davis's testimony, please see the Direct Testimony of Princess Davis filed on October 29, 2019. Ohio Edison reserves the right to disclose any other expert witnesses it expects or intends to call.

**INT-33:** Identify every non-expert witness you expect or intend to call at the hearing and the subject matter upon which you expect them to testify.

**RESPONSE:** Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which witnesses, if any, it expects or intends to call at the hearing in this matter. Ohio Edison will disclose its witnesses in accordance with the procedural schedule.

**SUPPLEMENTAL RESPONSE:** Ohio Edison objects to this interrogatory as premature. Ohio Edison has not yet determined which non-expert witnesses it expects or intends to call at the hearing in this matter. Subject to and without waiving any objections, Ohio Edison expects and intends to call Complainant Enyart on cross at the hearing regarding the subject matter of his Direct Testimony filed on October 29, 2019. Ohio Edison reserves the right to disclose any other non-expert witnesses it expects or intends to call.

**INT-34:** Identify every document, exhibit, or demonstrative you intend or expect to introduce as a document at the hearing.

**RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase “introduce as a document at the hearing” is undefined and subject to multiple interpretations. Ohio Edison construes this phrase to refer to documents Ohio Edison intends to formally introduce as exhibits to the record at hearing. Ohio Edison further objects to this interrogatory as premature. Ohio Edison has not yet determined which exhibits it will introduce into the record at hearing. Ohio Edison further objects to this interrogatory to the extent it seeks disclosure of exhibits beyond the requirements of the Commission’s rules or the Ohio Rules of Civil Procedure. Ohio Edison will identify the exhibits it intends to introduce at hearing at the appropriate time in accordance with those rules and any applicable Commission orders.

**INT-35:** Did Ohio Edison provide Enyart notice that OE would not provide service to Enyart within the prescribed time frame once OE was aware that the Property was ready for service and all other regulatory and tariff requirements were met.

**RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase “the prescribed time frame” is undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1,

2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase “the prescribed time frame” is undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory because it implies that Ohio Edison did not provide service to Enyart on the first business day following his request for service. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Enyart’s property was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it began providing service to Enyart’s property under his accounts on January 29, 2018, as Enyart requested.

**INT-36:** If the Response to INT-35 above is negative explain why.

**RESPONSE:** Ohio Edison objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666,

that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory because it implies that Ohio Edison did not provide service to Enyart on the first business day following his request for service. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Enyart's property was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it "would not provide service to Enyart." Subject to and without waiving any objections, Ohio Edison states that it began providing service to Enyart's property under his accounts on January 29, 2018, as Enyart requested.

**INT-37:** Did Ohio Edison provide Enyart notice that OE would not provide service to Enyart within the prescribed time frame once OE should have been aware that the Property was ready for service and all other regulatory and tariff requirements were met.

**RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrase "the prescribed time frame" is undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware, or should have been aware, that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it "would not provide service to Enyart." Subject to and without waiving any objections, Ohio Edison states that it

learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

**AMENDED RESPONSE:** Ohio Edison objects to this interrogatory as vague and ambiguous because the phrases “the prescribed time frame” and “should have been aware” are undefined and subject to multiple interpretations. Ohio Edison further objects to this interrogatory because it implies that Ohio Edison did not provide service to Enyart on the first business day following his request for service. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Enyart’s property was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it began providing service to Enyart’s property under his accounts on January 29, 2018, as Enyart requested.

**INT-38:** If the Response to INT-37 above is negative explain why.

**RESPONSE:** Ohio Edison objects to this interrogatory to the extent it implies that Ohio Edison was aware, or should have been aware, that service to Meter 680628666 was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it “would not provide service to Enyart.” Subject to and without waiving any objections, Ohio Edison states that it learned on February 1, 2018 that, due to a system error, service was not being

provided to Meter 680628666, that Ohio Edison discussed the matter with Enyart that day, and that Ohio Edison promptly unblocked Meter 680628666 on February 1, 2018.

***AMENDED RESPONSE:*** Ohio Edison objects to this interrogatory because it implies that Ohio Edison did not provide service to Enyart on the first business day following his request for service. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison was aware that service to Enyart's property was not being provided between January 29, 2018 and February 1, 2018 and determined not to notify Enyart. Ohio Edison further objects to this interrogatory to the extent it implies that Ohio Edison determined that it "would not provide service to Enyart." Subject to and without waiving any objections, Ohio Edison states that it began providing service to Enyart's property under his accounts on January 29, 2018, as Enyart requested.

**RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

**RFP-1:** Provide all documents identified in Ohio Edison's interrogatory responses.

**RESPONSE:** Ohio Edison will produce the non-privileged, non-protected, and non-public documents, if any, identified in its responses to Enyart's interrogatories.

**RFP-2:** Provide all documents consulted or relied upon to prepare Ohio Edison's interrogatory responses.

**RESPONSE:** Ohio Edison will produce any non-privileged, non-protected, and non-public responsive documents in its possession, custody, or control.

**RFP-3:** Provide all documents Ohio Edison may introduce at any depositions or hearings in this matter.

**RESPONSE:** Ohio Edison objects to this request as vague and ambiguous because the term "introduce" is undefined and subject to multiple interpretations. Ohio Edison construes this phrase to refer to documents Ohio Edison intends to formally introduce as exhibits to the record at hearing or at deposition. Ohio Edison further objects to this request as premature. Ohio Edison has not yet determined which exhibits it will introduce into the record at hearing or at deposition. Ohio Edison further objects to this request to the extent it seeks disclosure of exhibits beyond the requirements of the Commission's rules or the Ohio Rules of Civil Procedure. Ohio Edison will identify the exhibits it intends to introduce at hearing or at deposition at the appropriate time in accordance with those rules and any applicable Commission orders.



**RFP-4:** Provide all documents executed between Enyart and Ohio Edison.

**RESPONSE:** Ohio Edison objects to this request because it seeks documents that are already within Enyart's possession, custody, or control. Subject to and without waiving any objections, Ohio Edison is not currently aware of any documents responsive to this request.

**RFP-5:** Provide all documents provided to customers who accept the same type of service as Enyart.

**RESPONSE:** Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and ambiguous. This request facially seeks documents that are not relevant to the current proceeding between Enyart and Ohio Edison, given that the request seeks documents relating only to other customers of Ohio Edison. The request is also unlimited as to time and would literally require Ohio Edison to search for and produce "all documents" ever "provided to" Ohio Edison's current and former customers "who accept the same type of service as Enyart." The request therefore ignores all reasonable bounds placed on discovery by the Commission's rules and the Ohio Rules of Civil Procedure, and purports to impose an immense and unreasonable burden on Ohio Edison. Ohio Edison further objects to the request because the phrase "all documents provided to customers" is undefined and subject to multiple interpretations. Ohio Edison will not produce documents in response to this objectionable request.

**RFP-6:** Provide all documents, including written correspondence (including electronic mail) exchanged between Ohio Edison or any of its agents, representatives, or employees and Enyart from January 2018 to the present.

**RESPONSE:** Ohio Edison objects to this request because it seeks documents that are already within Enyart's possession, custody, or control. Ohio Edison further objects to this request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence because it seeks the production of "all documents" "exchanged" between Ohio Edison and Enyart since January 2018 without regard to whether such documents relate to Enyart's complaint against Ohio Edison. Ohio Edison construes this request to seek documents that are related to Enyart's complaint. Subject to this clarification and its objections, Ohio Edison is not currently aware of any documents responsive to this request that are not already within Enyart's possession, custody, or control.

**RFP-7:** Provide all documents, written correspondence (including electronic mail) exchanged between any Ohio Edison employee or representative and any other Ohio Edison employee or representative that relates to the actions and inactions alleged in the Complaint in this matter starting January 2018 through the present.

**RESPONSE:** Ohio Edison objects to this request because it seeks documents protected by the attorney-client privilege and work-product doctrines. Subject to and without waiving any objections, Ohio Edison will produce any non-privileged, non-protected responsive documents in its possession, custody, or control.

**RFP-8:** Provide the notification Ohio Edison sent to Enyart notifying him they would not complete his service installation within the timeframe prescribed by O.A.C. 4901:1-10-09 (A) – O.A.C. 4901:1-10-09 (A)(1)(c).

**RESPONSE:** Ohio Edison objects to this request as not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Information concerning the system-wide

performance standards identified by Rule 4901:1-10-09, O.A.C., is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further states that it learned on February 1, 2018 that, due to a system error, service was not being provided to Meter 680628666 and that Ohio Edison discussed the matter with Enyart that day. Subject to and without waiving any objections, Ohio Edison is not currently aware of any responsive documents.

**AMENDED RESPONSE:** Ohio Edison objects to this request as not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Information concerning the system-wide performance standards identified by Rule 4901:1-10-09, O.A.C., is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ohio Edison further objects to this request because it implies that Ohio Edison did not complete Enyart's service installation request on January 29, 2018. Ohio Edison states that it began providing service to Enyart's property under his accounts on January 29, 2018, as Enyart requested. Subject to and without waiving any objections, Ohio Edison states that responsive documents do not exist.

**RFP-9:** Provide the call logs, recorded calls, and or transcripts of every telephone conversation between Enyart Ohio Edison from January 2018 to March 2018.

**RESPONSE:** Ohio Edison will produce files containing recorded calls between Enyart and Ohio Edison from January 2018 to March 2018.

**RFP-10:** Provide the call logs, recorded calls, and or transcripts of every telephone conversation between Ohio Edison and Enyart from April 2018 to June 2018.

**RESPONSE:** Ohio Edison will produce files containing recorded calls between Enyart and Ohio Edison from April 2018 to June 2018.

**RFP-11:** Provide all documents reflecting, referring, or relating to meter readings for the Property from January 2018 until June 2018.

**RESPONSE:** Ohio Edison objects to this request as vague, ambiguous, overbroad, and unduly burdensome because the phrase “reflecting, referring, or relating to meter readings for the Property” is undefined and subject to multiple interpretations. Subject to and without waiving any objections, Ohio Edison will produce meter reading results for the meters at 50 Newton St., Norwalk, Ohio 44857 from January 2018 to present.

**RFP-12:** Provide all documents reflecting, referring, or relating to installations of any equipment of any kind by Ohio Edison at or on the Property from December 2017 to June 2018.

**RESPONSE:** Ohio Edison is not currently aware of any responsive documents.

**RFP-13:** Provide all documents reflecting, referring, or relating to Enyart.

**RESPONSE:** Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and ambiguous. Ohio Edison further objects to this request because it seeks documents protected by the attorney-client privilege and work-product doctrines. This request is unlimited as to time and seeks “all documents reflecting, referring, or relating to Enyart” without regard to whether such documents relate to the subject matter of this proceeding—Enyart’s complaint against Ohio Edison. The request therefore ignores all reasonable bounds placed on discovery by the Commission’s rules and the Ohio Rules of Civil Procedure, and would literally require Ohio Edison to search the entirety of its records for any documents “reflecting, referring, or relating to Enyart.” Further, the phrase “reflecting, referring, or relating to Enyart” is undefined and subject

to multiple interpretations, rendering the request vague and ambiguous. Ohio Edison will not produce documents in response to this objectionable request.

**RFP-14:** Provide all documents reflecting, referring, or relating to Ohio Edison's equipment and/or meters for reading electricity used at the Property from December 2017 to March 2018.

**RESPONSE:** Ohio Edison objects to this request as not relevant, not reasonably calculated to lead to the discovery of admissible evidence, overbroad, unduly burdensome, and vague and ambiguous. This request is so lacking in specificity that Ohio Edison cannot know to which documents the request is referring. Further, the phrase "all documents reflecting, referring, or relating to Ohio Edison's equipment and/or meters for reading electricity used at the Property" is undefined and subject to multiple interpretations, rendering the request vague and ambiguous. Ohio Edison will not produce documents in response to this objectionable request.

Dated: May 15, 2020

Respectfully submitted,

/s/ Ryan A. Doringo

---

Christine E. Watchorn (0075919)  
Counsel of Record  
FirstEnergy Service Company  
100 E. Broad Street, Suite 2225  
Columbus, Ohio 43215  
(614) 437-0183  
cwatchorn@firstenergycorp.com

Ryan A. Doringo (0091144)  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Tel: (216) 586-3939  
Fax: (216) 579-0212  
radoringo@jonesday.com

*Attorneys for Respondent Ohio Edison  
Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by email this 15<sup>th</sup> day of May,  
2020 upon the following:

Mark A. Whitt  
The KeyBank Building  
88 E. Broad Street, Suite 1590  
Columbus, Ohio 43215  
whitt@whitt-sturtevant.com

*Counsel for Complainant*

/s/ Ryan A. Doringo  
*Attorney for Ohio Edison Company*

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

**Commission of Ohio Docketing Information System on**

**5/11/2021 10:48:34 AM**

**in**

**Case No(s). 18-1734-EL-CSS**

Summary: Exhibit Ohio Edison Exhibit 10

Ohio Edison Company's Amended and Supplemental Responses and Objections to Complainant's First Set of Combined Discovery Requests electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Cunningham, Cindy