

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |   |                        |
|--|---|------------------------|
| In the Matter of the Review of Ohio    | : |                        |
| Edison Company, The Cleveland Electric | : |                        |
| Illuminating Company, and The Toledo   | : | Case No. 17-974-EL-UNC |
| Edison Company's Compliance with R.C.  | : |                        |
| 4928.17 and Ohio Adm. Code Chapter     | : |                        |
| 4901:1-37.                             | : |                        |

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**MOTION FOR EXTENSION OF TIME  
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 deadline for the filing of the Final Report provided for in the Commission's Entry of January 27, 2021 be extended to August 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 objects to the issuance of an immediate ruling or to the requested extension of the deadlines identified above.

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/ Thomas G. Lindgren*

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**Thomas G. Lindgren** (0039210)  
**Werner L. Margard III** (0024858)  
Assistant Attorneys General  
Public Utilities Section  
30 E. Broad St., 26th Floor  
Columbus, OH 43215  
614.466.4395 (telephone)  
614.644.8764 (fax)  
[Thomas.Lindgren@OhioAGO.gov](mailto:Thomas.Lindgren@OhioAGO.gov)  
[Werner.Margard@OhioAGO.gov](mailto:Werner.Margard@OhioAGO.gov)

*Counsel for Staff of the  
Public Utilities Commission of Ohio*

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## MEMORANDUM IN SUPPORT

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By Entry of November 4, 2020, this case involves an audit of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the Companies) for compliance with the corporate separation provisions of R.C. 4928.17 and with the Companies' Commission-approved corporate separation plans for the period between November 1, 2016 and October 31, 2020. On January 27, 2021 the Public Utilities Commission of Ohio (Commission) selected Daymark Energy Advisors, Inc. (Daymark or Auditor) to conduct the audit services necessary to assist the Commission with the audit. The Entry, pursuant to paragraph 14, incorporated the terms and the conditions of the Request for Proposal (RFP) into the contract between FirstEnergy and Daymark, except that the Commission established June 21, 2021 as the deadline for the Final Audit Report to be filed with the Commission.

Due to the depth and complexity of the audit, and delays in receiving responses to data requests from the Companies, Daymark requires additional time to complete the gathering of evidence and analysis which is central to their review.

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. Counsel has contacted all parties to ascertain whether any party has an objection to consideration of this motion on an

expedited basis. Although responses have not been received from all parties, to date no party that has responded have expressed any objection to an expedited ruling.

Respectfully submitted,

**David Yost** (0056290)  
Attorney General

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

*/s/ Thomas G. Lindgren*

---

**Thomas G. Lindgren** (0039210)  
**Werner L. Margard III** (0024858)  
Assistant Attorneys General  
Public Utilities Section  
30 E. Broad St., 26<sup>th</sup> Floor  
Columbus, OH 43215  
614.466.4395 (telephone)  
614.644.8764 (fax)  
[Thomas.Lindgren@OhioAGO.gov](mailto:Thomas.Lindgren@OhioAGO.gov)  
[Werner.Margard@OhioAGO.gov](mailto:Werner.Margard@OhioAGO.gov)

*Counsel for Staff of the  
Public Utilities Commission of Ohio*

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Extension of Time 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 11<sup>th</sup> day of June, 2021.

/s/ Thomas G. Lindgren

**Thomas G. Lindgren**

Assistant Attorney General

### PARTIES OF RECORD:

**Maureen Willis** (0020847)

**John Finnigan** (0018689)

Assistant Consumers' Counsel  
Office of the Ohio Consumers' Counsel  
65 East State Street, 7<sup>th</sup> Floor  
Columbus, Ohio 43215-4213  
[maureen.willis@occ.ohio.gov](mailto:maureen.willis@occ.ohio.gov)  
[john.finnigan@occ.ohio.gov](mailto:john.finnigan@occ.ohio.gov)

*Counsel for the Office of the Ohio  
Consumers' Counsel*

**Caroline Cox** (0098175)

Environmental Law & Policy Center  
21 W. Broad St., Floor 8  
Columbus, OH 43215  
[ccox@elpc.org](mailto:ccox@elpc.org)

*Counsel for Environmental Law & Policy  
Center*

**Kimberly W. Bojko** (0069402)

**Thomas V. Donadio** (0100027)

Carpenter Lipps & Leland LLP  
280 North High Street, Suite 1300  
Columbus, Ohio 43215  
[Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)  
[Donadio@carpenterlipps.com](mailto:Donadio@carpenterlipps.com)

*Counsel for the Ohio Manufacturers'  
Association Energy Group*

**Robert Dove** (0092019)

Kegler Brown Hill + Ritter Co., L.P.A.  
65 E State St., Ste. 1800  
Columbus, OH 43215  
[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)

*Counsel for the Natural Resources  
Defense Council, Ohio Partners for  
Affordable Energy, and Calpine Energy  
Solutions, LLC*

**Miranda Leppla** (0086351)  
**Trent Dougherty** (0079817)  
**Chris Tavenor** (0096642)  
1145 Chesapeake Avenue, Suite I  
Columbus, Ohio 43212-3449  
614.487.7506 (telephone)  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)  
[tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  
[ctavenor@theOEC.org](mailto:ctavenor@theOEC.org)

*Counsel for the Ohio Environmental  
Council*

**Devin D. Parram** (0082507)  
**Rachel N. Mains** (0098681)  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
614.227.8813 (telephone)  
[dparram@bricker.com](mailto:dparram@bricker.com)  
[rmains@bricker.com](mailto:rmains@bricker.com)

*Counsel for the Ohio Hospital Association*

**Madeline Fleisher** (0091862)  
Dickinson Wright PLLC  
150 East Gay Street, Suite 2400  
Columbus, Ohio 43215  
614.591.5474 (telephone)  
[mfleisher@dickinsonwright.com](mailto:mfleisher@dickinsonwright.com)

**Michael W. Wise** (0046694)  
McDonald Hopkins  
600 Superior Avenue East Suite 2100  
Cleveland, OH 44114  
216.430.2034 (telephone)  
[mwise@mcdonaldhopkins.com](mailto:mwise@mcdonaldhopkins.com)

*Counsel for Citizens' Utility Board of  
Ohio*

**Evan Betterton** (0100089)  
**Bethany Allen** (0093732)  
**Joseph Olikier** (0086088)  
**Michael Nugent** (0090408)  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
614.659.5000 (telephone)  
[evan.betterton@igs.com](mailto:evan.betterton@igs.com)  
[bethany.allen@igs.com](mailto:bethany.allen@igs.com)  
[joe.oliker@igs.com](mailto:joe.oliker@igs.com)  
[michael.nugent@igs.com](mailto:michael.nugent@igs.com)

*Counsel for IGS Energy*

**Matthew R. Pritchard** (0088070)  
**Todd A. Long** (0082296)  
McNees Wallace & Nurick LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215  
614.719.2842 (telephone)  
[mpritchard@mcneeslaw.com](mailto:mpritchard@mcneeslaw.com)  
[tlong@mcneeslaw.com](mailto:tlong@mcneeslaw.com)

*Counsel for the Industrial Energy Users-  
Ohio*

**Glenn S. Krassen** (0007610)  
Bricker & Eckler LLP  
1001 Lakeside Avenue, Suite 1350  
Cleveland, OH 44114  
216.523.5405 (telephone)  
[gkrassen@bricker.com](mailto:gkrassen@bricker.com)

**Dane Stinson** (0019101)  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
614.227.2300 (telephone)  
[dstinson@bricker.com](mailto:dstinson@bricker.com)

*Counsel for Northeast Ohio Public Energy  
Council*

**Mark A. Whitt** (0067996)  
**Lucas A. Fykes** (0098471)  
Whitt Sturtevant LLP  
88 E. Broad St., Suite 1590  
Columbus, Ohio 43215  
614.224.3946 (telephone)  
[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[fykes@whitt-sturtevant.com](mailto:fykes@whitt-sturtevant.com)

*Attorneys for Retail Energy Supply  
Association*

**Brian J. Knipe** (0090299)  
FirstEnergy Service Company  
76 S. Main St.  
Akron, Ohio 44308  
[bknipe@firstenergycorp.com](mailto:bknipe@firstenergycorp.com)

**Michael R. Gladman** (0059797)  
**Margaret M. Dengler** (0097819)  
Jones Day  
325 John H. McConnell Blvd Suite 600  
Columbus, Ohio 43215  
[mrgladman@jonesday.com](mailto:mrgladman@jonesday.com)  
[mdengler@jonesday.com](mailto:mdengler@jonesday.com)

**Ryan A. Doringo** (0091144)  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
[radoringo@jonesday.com](mailto:radoringo@jonesday.com)

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

**Michael Wager** (0043818)  
**Ina O. Avalon** (0093575)  
Taft Stettinius & Hollister LLP  
200 Public Square, Suite 3500  
Cleveland, OH 44114-2302  
216.241.2838 (telephone)  
[mwager@taftlaw.com](mailto:mwager@taftlaw.com)  
[iavalon@taftlaw.com](mailto:iavalon@taftlaw.com)

*Attorneys for Vistra Energy Corp*

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