

**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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**AMENDED 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 June 17, 2021 to September 13, 2021.

Staff further requests that the Commission grant its amended motion on an expedited basis pursuant to Ohio Adm. Code 4901-1-12(C).

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

Respectfully submitted,

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Attorney General

**John H. Jones** (0051913)  
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*/s/ Thomas G. Lindgren*

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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.

On June 11, 2021, Staff moved for an extension of the filing date for the final audit report. Daymark required additional time to complete the gathering of evidence and analysis central to its review in light of the complexity of the audit, and delays in receiving responses to data requests from the Companies. Daymark and Staff now believe that subsequent events warrant granting additional time.

Ohio Adm. Code 4901-1-12(C) allows requests that the Commission consider an amended 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 amended motion. Counsel has contacted all parties to ascertain whether any party has an objection to consideration of this amended motion on an expedited basis. Although responses have not been received from all parties, all but two parties (OCC and NOPEC) that have responded have expressed no objection to the extension or to an expedited ruling.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Amended 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 3<sup>rd</sup> day of August, 2021.

/s/Thomas G. Lindgren

**Thomas G. Lindgren**

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Summary: Motion Amended Motion for Extension of Time 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