

Respectfully submitted,

David Yost (0056290)
Attorney General

John H. Jones (0051913)
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Werner L. Margard III
Kyle Kern

Assistant Attorneys General
Public Utilities Section
30 E. Broad St., 26th Floor
Columbus, OH 43215
Tel.: (614) 466-4395
Fax: (614) 644-8764

thomas.lindgren@OhioAGO.gov

werner.margard@OhioAGO.gov

kyle.kern@OhioAGO.gov

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

MEMORANDUM IN SUPPORT

By Entry of April 7, 2021, this case involves an audit of the Distribution Modernization Rider of the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the Companies). On June 2, 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.

Pursuant to the June 2, 2021 Entry, the draft audit report is now due on October 15, 2021 and the final audit report is to be filed by October 29, 2021. Daymark has informed the Staff that it requires 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. Therefore, Staff requests an extension until December 2, 2021 for the draft report and December 16, 2021 for the filing of the final report.

Ohio Adm. Code 4901-1-12(C) allows the Commission to consider a motion on an expedited basis. Inasmuch as the current deadline for the Draft Audit Report is one day away, Staff respectfully requests an 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 has expressed any objection to the extension or to an expedited ruling.

Respectfully submitted,

David Yost (0056290)
Attorney General

John H. Jones (0051913)
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Werner L. Margard III
Kyle Kern

Assistant Attorneys General
Public Utilities Section
30 E. Broad St., 26th Floor
Columbus, OH 43215
Tel.: (614) 466-4395
Fax: (614) 644-8764

thomas.lindgren@OhioAGO.gov
werner.margard@OhioAGO.gov
kyle.kern@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 14th day of October, 2021.

/s/ Thomas G. Lindgren

Thomas G. Lindgren

Assistant Attorney General

PARTIES OF RECORD:

sgoyal@jonesday.com

dparram@bricker.com

rmains@bricker.com

gkrassen@bricker.com

dstinson@bricker.com

trhayslaw@gmail.com

mkurtz@BKLlawfirm.com

kboehm@BKLlawfirm.com

jkylercohn@BKLlawfirm.com

mrgladman@jonesday.com

mdengler@jonesday.com

radoringo@jonesday.com

tlong@mcneeslaw.com

Maureen.willis@occ.ohio.gov

john.finnigan@occ.ohio.gov

mleppla@theOEC.org

tdougherty@theOEC.org

rkelter@elpc.org

fykes@whitt-sturtevant.com

whitt@whitt-sturtevant.com

ctavenor@theoec.org

hvogel@elpc.org

leslie.kovacik@toledo.oh.gov

mfleisher@dickinsonwright.com

mwise@mcdonaldhopkins.com

bknipe@firstenergycorp.com

mwager@taftlaw.com

iavalon@taftlaw.com

mpritchard@mcneeslaw.com

rdove@keglerbrown.com

Donadio@carpenterlipps.com

Bojko@carpenterlipps.com

Attorney Examiner:

Gregory.Price@puco.ohio.gov

Megan.Addison@puco.ohio.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/14/2021 3:02:56 PM

in

Case No(s). 17-2474-EL-RDR

Summary: 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