

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Determination of the)
Existence of Significantly Excessive Earnings)
for 2017 Under the Electric Security Plan of) Case No. 18-857-EL-UNC
Ohio Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company)

In the Matter of the Determination of the)
Existence of Significantly Excessive Earnings)
for 2018 Under the Electric Security Plan of) Case No. 19-1338-EL-UNC
Ohio Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company)

In the Matter of the Determination of the)
Existence of Significantly Excessive Earnings)
for 2019 Under the Electric Security Plan of) Case No. 20-1034-EL-UNC
Ohio Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company)

In the Matter of the Quadrennial Review)
Required by R.C. 4928.143(E) for the Electric)
Security Plan of Ohio Edison Company, The) Case No. 20-1476-EL-UNC
Cleveland Electric Illuminating Company, and)
The Toledo Edison Company)

MOTION FOR 14-DAY EXTENSION OF THE REMAINING CASE SCHEDULE

EXPEDITED RULING REQUESTED

Pursuant to Ohio Adm.Code 4901-1-13(A) and for good cause shown, Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (collectively, the “Companies”) move for a 14-day extension of the entirety of the remaining case schedule, including the Monday, October 18th deadline for intervenor supplemental testimony. The Companies request the extension in light of the ongoing settlement discussions among the

Companies and intervenors. The reasons for this request are set forth more fully in the accompanying memorandum in support.

Pursuant to Ohio Adm.Code 4901-1-12(C), the Companies request an expedited ruling on this Motion. Following an intervenor's expressed interest in an extension, counsel for the Companies contacted all parties on Friday, October 15, 2021, to inform them that the Companies would request this extension and seek an expedited ruling. The Companies inquired whether any party would object to the relief requested or expedited treatment. The Companies certify each party has indicated they do not have any objection to this motion or to expedited consideration of the motion.

WHEREFORE, the Companies respectfully request that the case schedule be modified as set forth in this Motion.

Respectfully submitted,

/s/ N. Trevor Alexander

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**MEMORANDUM IN SUPPORT OF
MOTION FOR 14-DAY EXTENSION OF THE REMAINING CASE SCHEDULE**

On August 9, 2021, the Attorney Examiner issued an Entry in the above-captioned dockets establishing the most recent procedural schedule, which rescheduled the hearing for November 29, 2021, and extended the deadline for filing supplemental intervenor testimony to October 18, 2021. Pursuant to Rule 4901-1-13, there is good cause to move all remaining scheduled dates for fourteen (14) days.

The Companies have previously communicated to the Commission their intention to actively pursue settlement discussions. The Companies have filed reports regarding those discussions on September 1, 2021 and most recently on October 1, 2021. Those settlement discussions continue. Accordingly, the Companies believe a 14-day extension of time would be appropriate to allow those discussions to continue.

By granting this Motion, the Commission will provide an opportunity for the parties to resolve the contested issues in these cases without having to put the Commission, its Staff, and all other parties through preparation for an evidentiary hearing that may be unnecessary. Specifically, the parties wish to avoid requiring intervenors to prepare and submit supplemental testimony on October 18, 2021.¹ Granting this Motion will benefit all parties by providing a meaningful opportunity to resolve these matters through settlement and negotiation.

Finally, pursuant to Ohio Adm.Code 4901-1-12(C), the Companies request an expedited ruling on this Motion. Accordingly, pursuant to Rules 4901-1-12 and 4901-1-13 of the Ohio Administrative Code, the Companies respectfully request a 14-day extension of the case schedule.

¹ The Companies reserve their rights to challenge supplemental intervenor testimony on any available grounds.

Respectfully submitted,

/s/ N. Trevor Alexander

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CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 15th day of October 2021. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ N. Trevor Alexander
*One of the Attorneys for Ohio Edison
Company, The Cleveland Electric
Illuminating Company, and The
Toledo Edison Company*

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 18-0857-EL-UNC, 19-1338-EL-UNC, 20-1034-EL-UNC, 20-1476-EL-UNC

Summary: Motion Motion for 14-Day Extension of the Remaining Case Schedule - Expedited Ruling Requested electronically filed by Mark T Keaney on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company