BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

MEMORANDUM CONTRA MOTION TO QUASH SUBPOENA FILED BY EBONY YEBOAH-AMANKWAH (FIRSTENERGY'S FORMER VICE PRESIDENT, GENERAL COUNSEL AND CHIEF ETHICS OFFICER) BY OFFICE OF THE OHIO CONSUMERS' COUNSEL

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OFFICE OF THE OHIO CONSUMERS' COUNSEL

I. INTRODUCTION

Former FirstEnergy executive Ebony Yeboah-Amankwah (whose responsibilities included FirstEnergy's corporate separation) has filed to quash the subpoena that OCC served to take her deposition. The PUCO should deny the motion to quash.

This case involves an audit of FirstEnergy Utilities' corporate separation compliance. Under Ohio law, the FirstEnergy Ohio Utilities must implement and operate under a corporate separation plan that "satisfies the public interest" and is "sufficient" to protect Ohioans from undue preference or advantage being given to the utilities' affiliate(s). Under provisions of O.A.C. 4901:1-37-07, the FirstEnergy Ohio Utilities are obligated to "maintain records sufficient to demonstrate compliance with this chapter" and must produce, upon the request of the PUCO Staff, "all books, accounts and /or other pertinent records kept by an electric utility or its affiliates" related to businesses which require corporate separation. A key to investigating a utility's compliance with these corporate separation provisions is the utility's compliance officer. The utility's

compliance officer, must, among other things, certify that the utility's corporate separation plan complies with the PUCO's rules and orders.

FirstEnergy Corp.'s former Vice President, General Counsel and Chief Ethics Officer, Ms. Ebony Yeboah-Amankwah, was the person ultimately responsible for FirstEnergy's corporate separation compliance (including the three regulated utilities in Ohio) during most of the period of the PUCO's audit. In that position, which she held from July 30, 2017 to early November 2020, Ms. Yeboah Amankwah served as the compliance officer with responsibility for certifying that the corporate separation plan was up to date and in compliance with PUCO rules and orders. *See* O.A.C. 4901:1-37-05(B)(11).

In consumers' interest, the PUCO should not prevent OCC from deposing this former FirstEnergy executive. OCC also seeks certain documents. If the deponent does not have the documents, then she may so answer. But she should be asked questions about certain documents or issues in the documents, even if she doesn't have or no longer has access to the documents.

Fact finding, such as this deposition, is necessary in part "to lift the 'black cloud' of [the] HB 6 scandal" from over the PUCO.[1] It's also necessary to discover facts, including facts that the PUCO's auditor stated could not be reviewed due to purportedly inaccessible records. Consistent with the PUCO pronouncement to follow the facts where they may lead,[2] the PUCO should deny the motion to quash and allow OCC's deposition.

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[1] J. Pelzer, *New PUCO Chair Jenifer French: more transparency needed to lift the 'black cloud' of [the] HB 6 scandal,* Cleveland.com (May 18, 2021).

[2] *In the Matter of the Review of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company's Compliance with R.C. 4928.17 and Ohio Adm. Code Chapter 4901:1-37*, Case No. 17-974-EL-UNC, Entry at ¶17 (Nov. 4, 2020).

II. ARGUMENT

A. Contrary to Ms. Yeboah-Amankwah's assertion, OCC's subpoena does not seek information outside the scope of this proceeding. To protect consumers, OCC seeks information that is relevant and reasonably calculated to lead to the discovery of admissible evidence per O.A.C. 4901-1-16(B).

Ms. Yeboah-Amankwah asserts that certain of OCC's document requests that are part of the subpoena are outside the scope of this proceeding and irrelevant. Specifically, Ms. Yeboah-Amankwah alleges that OCC's document requests are "improper because [they seek] broad information from a former officer of FirstEnergy Service Corp., an entity outside the Commission's statutory jurisdiction, and, in part, related to topics that are outside the subject matter of this proceeding."[3] For example, Ms. Yeboah-Amankwah asserts that OCC's document requests regarding payments to Lincoln Electric are beyond the scope of this proceeding, and that OCC made no effort to explain the relevance or substantial need for such documents.[4] Ms. Yeboah-Amankwah arguments are not well made.

Here is some context for OCC's discovery and Ms. Yeboah-Amankwah's efforts to avoid this discovery. Daymark, one of the PUCO-hired Auditors in this proceeding, reported that FirstEnergy's "Chief Ethics Officer" has "ultimate responsibility for corporate separation compliance."[5] Daymark noted that the Chief Ethics Officer position and other positions responsible for compliance monitoring and tracking were vacant while Daymark was conducting its audit.[6] Incredibly, Daymark noted that it "could not

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[3] Motion to Quash at 8.

[4] *Id.* at 9-10.

[5] Daymark Compliance Audit of FirstEnergy Operating Companies at 32 (Sept. 13, 2021).

[6] *Id.*

get access to records of the compliance officer in place during the audit period [2016 through 2020] since that person had been separated from the company prior to the start of the audit."[7]

It makes no sense for regulation for consumer protection to be shelved and the audit to be stopped in its tracks for purported inaccessibility of the documents on FirstEnergy's part. Indeed, the PUCO should have subpoenaed the information from FirstEnergy or former FirstEnergy employees for purposes of the audit. Who's in control – the government regulator and its auditor or the utility (FirstEnergy) being audited?

Also incredibly, Daymark wrote that it was advised by FirstEnergy staff that systems and processes in place for compliance monitoring and tracking during the four-year period now under PUCO investigation could not be located.[8] Again, this makes no sense for consumer protection.

Daymark noted that "[t]his limited Daymark's ability to assess the Company's compliance tracking and monitoring activities within the audit period."[9] Apparently Daymark is given to understatement. Again, incredibly, for the five-year period when FirstEnergy was part of "the largest bribery money laundering scheme in Ohio history" there were no compliance records to review. Such a compliance failure seems incomprehensible. *It is too convenient for FirstEnergy to not be auditable (which is a violation of O.A.C. 4901:1-37-07) and OCC is acting within the rules to learn more about the audit issues and other relevant issues.*

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[7] *Id.* at 1.

[8] *Id*. at 32.

[9] *Id.*

Note that FERC spoke of FirstEnergy's creative use of bookkeeping:

> Even more concerning, several factual assertions agreed to by FirstEnergy in DPA and the remedies FirstEnergy agreed to undertake, point towards internal controls having been possibly obfuscated or circumvented to conceal or mislead as to the actual amounts, nature, and purpose of the lobbying expenditures made, and as a result, the improper inclusion of lobbying and other nonutility costs in wholesale transmission billing rates.[10]

The deponent (Ms. Yeboah-Amankwah) was named Vice President, Corporate Secretary and Chief Ethics Officer at FirstEnergy Corp. in July 2017[11] and continued in that role until November 2020. In that role she acted as the compliance officer on corporate separation matters having succeeded the prior compliance officer, Ketan Patel. On November 9, 2020, FirstEnergy Corp. announced in filings in a filing with the Securities and Exchange Commission ("SEC"), Ms. Yeboah Amankwah was separated from FirstEnergy Corp. "due to inaction and conduct that the Board determined was influenced by the improper tone at the top."[12]

Ms. Yeboah-Amankwah, the deponent, had ultimate responsibility for corporate separation compliance for most of the four-year audit period (2016-2020) having served as Chief Ethics Officer from July 2017 through November 2020. The PUCO's rules[13]

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[10] *In re FirstEnergy Audit*, Docket No. FA19-1-000 at 48 (Feb. 4, 2022) (emphasis added).

[11] FirstEnergy Corp. News Release, *FirstEnergy names Ebony Yeboah-Amankwah Vice President, Corporate Secretary, and Chief Ethics Officer* (Jul. 18, 2017).

[12] FirstEnergy Corp. Form 10Q at 36 (Nov. 19, 2020).

[13] O.A.C. 4901:1-37-05(B)(11) provides that an electric utility's corporate separation plan must include: "A designation of the electric utility's compliance officer who will be the contact for the commission and staff on corporate separation matters. The compliance officer shall certify that the approved corporation separation plan is up to date and in compliance with the commission's rules and orders. The electric utility shall notify the commission and the director of the rates and analysis department (or their designee) of changes in the compliance officer." O.A.C. 4901:1-37-08(I) provides: "The compliance officer designated by the electric utility will act as the contact for the staff when staff seeks data regarding affiliate transactions, personnel transfers, and the sharing of employees."

underscore the importance of Ms. Yeboah-Amankwah and the position she held at FirstEnergy to corporate separation compliance (and thus this case, involving an audit of FirstEnergy's corporate separation compliance). She most certainly has information for answering questions relevant to corporate separation compliance, matters well-within the scope of this proceeding dealing with FirstEnergy's compliance with Ohio corporate separation laws. Ms. Yeboah's claims that such matters are outside the scope of this proceeding and not subject to the PUCO's jurisdiction are just plain wrong.

The testimony and documents requested regarding paying Lincoln Electric are also highly relevant. Again, under Ohio law, the FirstEnergy Ohio Utilities must implement and operate under a corporate separation plan that "satisfies the public interest" and is "sufficient" to protect Ohioans from undue preference or advantage being given to the utilities' affiliate(s).[14] Thus, Ohioans (and the PUCO) have an interest in this case to determine (for example) if the payment was made, why it was made, and who or what it benefited (the FirstEnergy Ohio Utilities, FirstEnergy Corp., other FirstEnergy Corp. affiliates) and who paid for it?

The testimony and documents requested by OCC cannot necessarily be obtained from other sources. Ms. Yeboah-Amankwah was in charge of corporate separation compliance during most of the audit period – she had ultimate responsibility. OCC would face undue hardship if it were deprived of her testimony and any documents she retained. OCC clearly has a substantial need for the testimony and documents that cannot be met through other means. And Ms. Yeboah-Amankwah has failed to show that testifying and producing the requested documents would be create an undue burden on her. In fact, Ms.

[14] R.C. 4928.17.

Yeboah-Amankwah should show undue burden (via an affidavit) in order to trigger the opposing party's obligation to show substantial need. *See, e.g.,* Ohio Civ. Rule 45.

The Motion to Quash should be denied.

B. Contrary to Ms. Yeboah-Amankwah's assertion, OCC's subpoena is neither unreasonable nor oppressive. Given OCC's discovery rights under law and rule, it is neither unreasonable nor oppressive for OCC to depose and seek documents from FirstEnergy's former Vice President, General Counsel and Chief Ethics Officer – the person with ultimate responsibility for corporate separation compliance.

Ms. Yeboah-Amankwah asserts that OCC's subpoena is unreasonable and oppressive under O.A.C. 4901-1-25. That is wrong. She asserts that the documents we request are not within her "control,"[15] and that without access to documents to refresh her recollection she would be unable to provide any non-speculative testimony.[16] If so, she can answer questions to that effect under oath at the deposition, but we think she will have answers to various questions that are helpful for truth and justice in this case. She also maintains that she is the wrong person to discuss issues of ethics and compliance with Ohio's corporate separation law.[17] This remains to be seen.

Ms. Yeboah-Amankwah was named Vice President, Corporate Secretary and Chief Ethics Officer at FirstEnergy Corp. in July 2017[18] and continued in that role until November 2020. Daymark, one of the PUCO-hired auditors in this proceeding, was advised that FirstEnergy's "Chief Ethics Officer" has "ultimate responsibility for

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[15] *Id.* at 6.

[16] *Id.* at 7.

[17] *Id.* at 7-8.

[18] FirstEnergy Corp. News Release, *FirstEnergy names Ebony Yeboah-Amankwah Vice President, Corporate Secretary, and Chief Ethics Officer* (Jul. 18, 2017).

corporate separation compliance."[19] Thus, Ms. Yeboah-Amankwah, the deponent, had ultimate responsibility for corporate separation compliance for most of the four-year audit period. Her assertion that she left before Daymark's audit[20] is beside the point -- she was ultimately responsible for compliance *during the majority of the time-period under review*. It is hard to believe that Ms. Yeboah-Amankwah would have no relevant information on FirstEnergy's compliance with Ohio corporate separation laws; that she is the "wrong person" with whom to discuss such matters.

Ms. Yeboah-Amankwah's asserts that she does not have requested documents in her "control." While this assertion may be true, it doesn't absolve her from producing documents within her *custody* or control."[21] So if she has documents that are responsive to the subpoena, she should be ordered to produce them. If she does not have documents responsive to a category of documents we have subpoenaed in her possession, custody, or control, Ms. Yeboah-Amankwah simply (and understandably) will not produce them. But that she may not have some responsive documents is no reason to quash the subpoena in its entirety.

This is especially so given that OCC's document requests are only *part* of the subpoena. Importantly, OCC has sought Ms. Yeboah-Amankwah's testimony through a deposition. OCC should and does have the right to question Ms. Yeboah-Amankwah under oath as to her assertion that she does not have documents we have requested.[22]

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[19] Daymark Compliance Audit of FirstEnergy Operating Companies at 32 (Sept. 13, 2021).

[20] *See* Motion to Quash at 7-8.

[21] Oh. Rs. Civ. Pro. 34, 45; O.A.C. 4901-1-20 (A).

[22] Parties have broad rights to discovery under law, rule, and Supreme Court of Ohio precedent. *See, e.g.,* R.C. 4903.082; O.A.C. 4901-1-16(B); O*CC v. PUC*, 111 Ohio St.3d 300 (2006).

Perhaps more importantly, OCC should and does have the right[23] under R.C. 4903.082 to question Ms. Yeboah-Amankwah about what corporate separation compliance documentation *did* exist and what corporate separation compliance steps she *did* take.

For example, Ms. Yeboah-Amankwah asserts that "pursuant to FirstEnergy's policies, [she] returned to the company all FirstEnergy documents in her personal possession at the time of her separation on November 8, 2020."[24] What documents did she turn over and to whom? Did they include corporate separation compliance documents? If so, what kind of documents? As mentioned, Ms. Yeboah-Amankwah had ultimate responsibility for corporate separation compliance for most of the four-year audit period. Surely, she would be well versed in what records she kept in order to assure the FirstEnergy Ohio Utilities were complying with the PUCO rules and orders on corporate separation.

Lastly, the PUCO should not accept Ms. Yeboah's claim that she would be unable to provide non-speculative testimony without access to documents to refresh her memory.[25] Ms. Yeboah-Amankwah's deposition will be conducted consistent with the PUCO discovery rules. If she is questioned on matters she cannot recall, and it is necessary to refresh her recollection, it is a matter to be handled at the deposition. This happens all the time at depositions. The prospect that Ms. Yeboah-Amankwah may have to refresh her recollection about a document is no reason to quash the subpoena. Nor should the fact that Ms. Yeboah acted as General Counsel and Deputy General Counsel

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[23] *See, e.g., Id.*

[24] Motion to Quash at 6

[25] Memo Contra at 8.

during the applicable time create a reason to quash the subpoena.[26] Any "complicated privilege issues" can be handled during the deposition, as well.

The Motion to Quash should be denied.

C. Contrary to Ms. Yeboah-Amankwah's assertion, OCC's subpoena is not untimely. OCC's subpoena is in consumers' interest and does not violate the procedural schedule in this case.

Ms. Yeboah-Amankwah asserts that the subpoena signed by the Attorney Examiner is "procedurally improper" because discovery is closed.[27] Ms. Yeboah-Amankwah's effort to prevent OCC's fact-finding is, once again, wrong and contrary to the PUCO's discovery rules.

The PUCO rules only require that discovery be completed before the commencement of a hearing. O.A.C. 4901-1-17(A). Discovery under the subpoena is intended to be completed before the hearing in this case, which is currently scheduled for May 9, 2022.

Ms. Yeboah-Amankwah, however, relies on an Entry of the PUCO issued many months ago,[28] before the current hearing date was rescheduled. At the time of the Entry, the discovery cut off was established consistent with O.A.C. 4901-1-17(A). Discovery was to be completed before the hearing was to take place. Unfortunately, in the last PUCO Entry,[29] which set the new hearing date of May 9, 2022, the PUCO failed to establish a new discovery cut-off. We believe this to be an inadvertent omission by the PUCO.

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[26] *Id.* at 9.

[27] *See Id.* at 11.

[28] *See* Entry (Oct. 12, 2021) setting a hearing date of Feb. 10, 2022, with discovery cut off Nov. 24, 2021.

[29] Entry (Feb. 10, 2022).

Most significantly, Ms. Yeboah-Amankwah fails to recognize that even in the Entry that set a discovery cut-off, the Attorney Examiner allowed parties to conduct depositions.[30] Depositions of non-party deponents can be conducted, with attendance compelled through subpoenas. O.A.C. 4901-1-25(A) allows the PUCO (and those acting on its behalf) to issue a subpoena to compel a person to give testimony at a time and place specified and command such person to produce "books, papers, documents, or other tangible things." O.A.C. 4901-1-25(D) allows parties to subpoena a person to attend and give testimony at a deposition, *and "to produce designated books, papers, document, or other tangible things within the scope of discovery."* That is just what OCC has done, consistent with the Entry allowing depositions to go forward, despite a discovery cut-off.

The Attorney Examiner did not rule that parties could not exercise their right to ask for documents to be produced at depositions. The Attorney Examiner in fact signed OCC's subpoena duces tecum. (Unfortunately for consumers, OCC does not have subpoena power (the General Assembly should change that). It must first get PUCO-ok to issue a subpoena.

An Attorney Examiner, on his or her own, may quash a subpoena.[31] He did not do so here.

Ms. Yeboah-Amankwah cites to several proceedings where the PUCO granted motions to quash.[32] Those cases, however, did not involve the truly unique circumstances that surround the PUCO's FirstEnergy investigation cases concerning FirstEnergy's H.B.

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[30] Case No. 17-974-EL-UNC, Entry, at ¶18(a) (Sep. 17, 2021) ("The deadline for the service of discovery, except for notices of deposition, shall be set for November 1, 2021."); Case No. 17-974-EL-UNC, Entry, at ¶24(a) (Oct. 12, 2021) (extending discovery cut-off to Nov. 24, 2021).

[31] O.A.C. 4901-1-25(C).

[32] *See, e.g.,* Motion to Quash at 11.

6 activities. These cases stem from what has been described as "likely the largest bribery, money laundering scheme ever perpetrated against the people of the state of Ohio." FirstEnergy Corp. stands charged with a federal crime—a crime which it has admitted.[33]

A variant of Ms. Yeboah-Amankwah's "too late" argument is that OCC has been somehow dilatory in this case.[34] First, as explained in this section, OCC's subpoena is compliant with PUCO rules and scheduling entries in this case. But second, OCC has served voluminous discovery, obtained hundreds of thousands of pages of documents, filed numerous interlocutory appeals, motions for subpoena, and motions to compel in this case and in other FirstEnergy investigation cases in consumers' interest and getting at the facts. Dilatory OCC is not.

The Motion to Quash should be denied. [35]

III. CONCLUSION

The PUCO's Attorney Examiner signed OCC's subpoena, which is part of giving Ohioans the benefit of a full investigation of FirstEnergy's corporate separation plan, including issues involving the FirstEnergy scandals. The PUCO must consider whether the plan satisfies the public interest. And the PUCO must consider whether the plan is sufficient to ensure the FirstEnergy Ohio Utilities do not extend undue preference or advantage to FirstEnergy affiliates, to the detriment of Ohio consumers.

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[33] United States of America v. FirstEnergy Corp., Case No. 1:21-cr-86, Deferred Prosecution Agreement (Jul. 22, 2021).

[34] *See, e.g.,* Motion to Quash at 4; 11.

[35] Further, the discovery cut-off, except notices of deposition, has largely been overcome by unforeseen, recent events. Since it agreed to produce documents to OCC in October, FirstEnergy Corp. has been dilatory in producing documents. Also, there have been delays in obtaining documents from the PUCO in response to OCC's public records request. Accordingly, OCC is preparing to file a motion for continuance, in consumers' interest.

The discovery sought from FirstEnergy's former Vice President, General Counsel and Chief Ethics Officer with ultimate compliance responsibility during the audit period is needed. The Motion to Quash should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Memorandum Contra was served on the persons stated below via electric transmission this 22nd day of March 2022.

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Summary: Memorandum Memorandum Contra Motion to Quash Subpoena Filed by Ebony Yeboah-Amankwah (FirstEnergy's Former Vice President, General Counsel and Chief Ethics Officer) by Office of the Ohio Consumers' Counsel electronically filed by Ms. Alana M. Noward on behalf of Willis, Maureen R.