

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 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 the Ohio Adm. Code)	
Chapter 4901:1-37.)	

**JOINT DISCOVERY STATUS REPORT
BY
OFFICE OF THE OHIO CONSUMERS' COUNSEL
NORTHEAST OHIO PUBLIC ENERGY COUNCIL
AND OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

Per ¶ 30 of the Attorney Examiners' April 7, 2022 Entry and ¶ 28 of the June 16, 2022 Entry, the Office of the Ohio Consumers' Counsel ("OCC"), the Northeast Ohio Public Energy Council ("NOPEC") and the Ohio Manufacturers' Association Energy Group ("OMAEG") (collectively, the "Consumer Parties") respectfully file this amended discovery status update. The Consumer Parties incorporate the information provided in their June 13, 2022 and June 22, 2022 Joint Discovery Status reports, and provide the following additional information in response to the Attorney Examiners' April 7, 2022 and June 16, 2022 Entries regarding the number of documents that the Consumer Parties have collectively reviewed.

I. DOCUMENT REVIEW

Table 1: Estimated Documents Produced by FirstEnergy Corp.

Produced	Initial Review Completed	Awaiting Initial Review
472,000 pages	Approx. 270,000 pages	Approx. 102,000 pages

Table 2: Estimated Documents Produced by FirstEnergy Utilities

Produced	Initial Review Completed	Awaiting Initial Review
40,000 pages	Approx. 26,000 pages	Approx. 14,000 pages

The FirstEnergy Utilities previously produced documents relating to the FERC audit of FirstEnergy Corp., but only through the date of the February 4, 2022 audit report. The FirstEnergy Utilities recently agreed to produce documents related to the FERC audit report that were created after February 4, 2022. The Consumer Parties expect to receive the first batch of these additional documents from the FirstEnergy Utilities relating to the FERC audit by July 11, 2022, with additional documents to be produced on a rolling basis thereafter.

II. DEPOSITIONS

The Consumer Parties have tentatively scheduled the deposition of Ms. Ebony Yeboah-Amankwah for July 21, 2022. We have yet to schedule the deposition of Mr. Jason Lisowski.

III. PROCEDURAL SCHEDULE

On June 22, 2022, the Consumer Parties filed a motion to extend the procedural schedule in light of the large volume of documents yet to be reviewed, and the new documents anticipated to be received in recent weeks. The Companies took “no position” on the Consumer Parties’ Motion. FirstEnergy Corp. did not file a responsive pleading. There has been no ruling on that Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Joint Discovery Status Report was served on the persons stated below via electric transmission this 11th day of July 2022.

/s/ Maureen R. Willis

Maureen R. Willis

Assistant Consumers' Counsel

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Case No(s). 17-0974-EL-UNC

Summary: Report Joint Discovery Status Report of Office of the Ohio Consumers' Counsel, Northeast Ohio Public Energy Council and Ohio Manufacturers' Association Energy Group electronically filed by Mrs. Tracy J. Greene on behalf of Willis, Maureen R.