

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Filing By) CASE NO. 16-481-EL-UNC
Ohio Edison Company, The)
Cleveland Electric Illuminating)
Company And The Toledo Edison)
Company Of A Grid Modernization)
Business Plan.)
)

In The Matter Of The Filing By) CASE NO. 17-2436-EL-UNC
Ohio Edison Company, The)
Cleveland Electric Illuminating)
Company And The Toledo Edison)
Company Of An Application For)
Approval Of A Distribution)
Platform Modernization Plan)
)

In The Matter Of The Application) CASE NO. 18-1604-EL-UNC
Of Ohio Edison Company, The)
Cleveland Electric Illuminating)
Company And The Toledo Edison)
Company To Implement Matters)
Relating To The Tax Cuts And Jobs)
Act Of 2017.)
)

In The Matter Of The Application) CASE NO. 18-1656-EL-ATA
Of Ohio Edison Company, The)
Cleveland Electric Illuminating)
Company And The Toledo Edison)
Company For Approval Of A Tariff)
Change)
)

**MOTION FOR EXTENSION OF TIME
TO FILE AUDIT REPORT WITH COMMISSION,
AND REQUEST FOR EXPEDITED RULING**

The Staff of the Public Utilities Commission of Ohio (Staff) moves for an extension of the deadline for the final audit report provided for in the Commission’s Entry of March 9, 2022.

Staff further requests that the Commission grant its motion on an expedited basis pursuant to Ohio Adm. Code 4901-1-12(C) and certifies both that no party objects to the issuance of an immediate ruling or to the requested extension of the deadlines identified above.

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

Respectfully submitted,

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Attorney General

John H. Jones (0051913)
Section Chief

/s/ Thomas G. Lindgren

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MEMORANDUM IN SUPPORT

By Entry of March 9, 2022, these cases involve a review of the operational benefits associated with the first phase of the grid modernization plan of the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the Companies). On April 20, 2022, 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 review. The Entry, pursuant to paragraph 16, incorporated the terms and the conditions of the Request for Proposal (RFP) into the contract between FirstEnergy and Daymark.

Pursuant to the April 20, 2022 Entry, the final audit report is to be filed by September 16, 2022. 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. Therefore, Staff requests an extension until October 14, 2022 for the filing of the final audit report.

Ohio Adm. Code 4901-1-12(C) allows the Commission to consider a motion on an expedited basis. 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,

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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 7th day of September, 2022.

/s/ Thomas G. Lindgren

Thomas G. Lindgren

Assistant Attorney General

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**Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-
ATA**

Summary: Motion for Extension of Time to File Audit Report with Commission, and Request for Expedited Ruling electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO