

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Edison Company, The Cleveland)	
Electric Illuminating Company, and)	Case No. 22-0704-EL-UNC
The Toledo Edison Company for)	
Approval of Phase Two of Their)	
Distribution Grid Modernization Plan)	

MOTION FOR A PROCEDURAL SCHEDULE

Pursuant to Ohio Adm. Code 4901-1-12, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”) respectfully move the Commission for a procedural schedule to be established in this case. The reasons for this request, and a recommended procedural schedule, are set forth more fully in the accompanying memorandum in support. The Companies’ proposed schedule will support a timely transition between Grid Mod I and Grid Mod II consistent with the Grid Mod I stipulation.

WHEREFORE, the Companies respectfully request that a procedural schedule be established as set forth in this Motion.

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF MOTION FOR A PROCEDURAL SCHEDULE

Pursuant to the approved Grid Mod I stipulation, the Companies are taking a phased approach to installing distribution grid modernization technologies across their service territories. The Commission Order authorizing Grid Mod I adopted a Stipulation and Recommendation that contemplates “a cost-effective, timely transition between Grid Mod I and Grid Mod II”:

During the term of this plan, the Companies agree to begin development of the next phase of grid modernization investments (Grid Mod II) using these or other technologies in order to facilitate a cost-effective, timely transition between Grid Mod I and Grid Mod II.¹

The Companies recently completed the installation of Grid Mod I technologies. On July 15, 2022, the Companies filed an Application requesting authorization for a second phase of investments (“Grid Mod II”) to continue the transition to a more modern distribution grid.

The Grid Mod I stipulation provides for Commission Staff to complete an operational benefits assessment and review prior to the commencement of Grid Mod II. On November 14, 2022, Staff’s consultant filed its final operational benefits assessment report in Case No. 16-481-EL-UNC. Because of the overlap between Grid Mod II and operational benefits assessment, the

¹ Case No. 16-481-EL-UNC et al., Stipulation and Recommendation filed November 9, 2018, p. 24.

Companies are considering filing supplemental testimony in Grid Mod II based on review of the auditor's recommendations.

To support a timely transition between Grid Mod I and Grid Mod II, the Companies respectfully request the following procedural schedule, which anticipates a hearing by no later than June 2023, and a Commission Order by the end of 2023:

Companies' Supplemental Testimony due	March 1, 2023
Motions to intervene due	April 1, 2023
Last day to serve written discovery on the Companies (other than depositions)	May 1, 2023
Intervenor testimony due	May 15, 2023
Staff testimony due	May 22, 2023
Procedural conference	June 5, 2023
Hearings	June 12, 2023

To date, seven parties have moved to intervene, and the Companies do not oppose their intervention. No party will be prejudiced by the proposed schedule, which provides eleven months between the application filing and the hearing date.

For the foregoing reasons, the Companies respectfully request that a procedural schedule be established as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio (“PUCO”) on this 23rd day of December 2022. 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

*Attorney for Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The Toledo
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**This foregoing document was electronically filed with the Public Utilities
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12/23/2022 9:09:54 AM

in

Case No(s). 22-0704-EL-UNC

Summary: Motion for Procedural Schedule electronically filed by Mr. N. Trevor Alexander on behalf of Ohio Edison Company and The Cleveland Illuminating Company and The Toledo Edison Company