

**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	)	

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**REPLY IN SUPPORT OF MOTION FOR A PROCEDURAL SCHEDULE**

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The Motion for Procedural Schedule (“Motion”) of the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (“Companies”) proposed a schedule that anticipates a Commission decision a year and five months after this case was filed. Only the Office of the Ohio Consumers’ Counsel (“OCC”) opposes the Motion.

OCC’s Memorandum Contra asserts the Motion is premature<sup>1</sup> and asks, “what’s the rush?”<sup>2</sup> As the Motion explained, the answer lies in the Grid Mod I Stipulation. The Stipulation – in a provision OCC agreed not to oppose<sup>3</sup> – commits the Companies to facilitating a “cost-effective, *timely transition* between Grid Mod I and Grid Mod II.”<sup>4</sup> Deployment of Grid Mod I equipment concluded around September 2022. The Motion’s proposed schedule would enable deployment of Grid Mod II equipment to begin in early 2024, roughly a year and a half later. The indefinite delay OCC urges would frustrate a “timely transition” to Grid Mod II.

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<sup>1</sup> OCC Memorandum Contra at 1.

<sup>2</sup> OCC Memorandum Contra at 2.

<sup>3</sup> Case No. 16-481-EL-UNC, *et al.*, Supplemental Stipulation and Recommendation (“Supplemental Stipulation”) filed January 25, 2019, p. 10 (providing that OCC “agrees not to oppose Sections V.B through V.I of the Original Stipulation”).

<sup>4</sup> Case No. 16-481-EL-UNC, *et al.*, Stipulation and Recommendation (“Stipulation”) filed November 9, 2018, p. 24 (Section V.H) (emphasis added).

OCC argues the Commission should not set a Grid Mod II procedural schedule until after issues related to the Grid Mod I<sup>5</sup> operational benefits assessment (“OBA”) are resolved. While the Companies appreciate the need for the Commission and parties to consider the OBA findings and recommendations, this process and Grid Mod II can proceed in parallel. The Companies’ proposed schedule will allow all parties to address the OBA findings and recommendations in Grid Mod II. Proceeding in parallel is consistent with the Grid Mod I Supplemental Stipulation. While the Supplemental Stipulation provides there shall be no *approval* to begin implementation of Grid Mod II until the Commission has resolved issues arising from the OBA,<sup>6</sup> it does not prohibit the Commission from setting a procedural schedule.

The Motion’s proposed procedural schedule allows sufficient time for the Commission to resolve any issues related to the OBA and for Grid Mod II to incorporate such resolutions. The Companies’ proposal provides for a Commission decision a year and five months after this case was filed. That will allow parties the time to analyze the OBA and make recommendations for Grid Mod II, and the Commission the time to resolve any issues related to the OBA.

While the Companies appreciate the matters raised in OCC’s memorandum contra, the proposed schedule accounts for these matters. The proposed schedule is reasonable, will support a “timely transition” between Grid Mod I and Grid Mod II, will allow ample time to consider the OBA and this case, and should be adopted by the Commission.

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<sup>5</sup> Case No. 16-0481-EL-UNC, *et al.*

<sup>6</sup> Supplemental Stipulation, p. 5

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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 17th day of January 2023. 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

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Edison Company*

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Summary: Reply in Support of Motion for a 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