

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Review of the Non-)
Market-Based Services Rider Pilot)
Program Established by Ohio Edison) Case No. 22-391-EL-RDR
Company, The Cleveland Electric)
Illuminating Company, and the Toledo)
Edison Company.)**

**OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY, AND THE TOLEDO EDISON COMPANY’S
RESPONSE TO THE ENTRY OF APRIL 7, 2023**

I. Introduction

Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”) respond to the Attorney Examiner’s April 7, 2023 Entry. The Companies share the Commission’s interest in completing this review of the Rider NMB Pilot as quickly as possible and seeing the Auditor’s determination of whether the Pilot provides net benefits for customers. The Companies are neutral with regard to the review’s outcome.

All the data requests in this audit were served January 26, 2023.¹ As of the April 7 Entry, of the thirty-three (33) data requests served, counting subparts, the Companies had answered thirty-two (32), producing information on a rolling basis. Those answers were completed between February 17 and March 14. Only one request, subpart (h) of DR-001, was incomplete. While the Companies were unable to complete a response to this data request by April 7, the Companies assure the Commission it was not due to lack of effort.

The Companies have worked diligently to collect the requested data. However, this data request is uniquely challenging for the Companies. As explained further below, the outstanding

¹ Staff’s first request for an extension, filed January 6, 2023, preceded data requests to the Companies.

request seeks nearly twelve years of customer-specific hourly load data for every Pilot participant since Rider NMB's inception. The Companies do not have data that far back. Further, locating, retrieving, converting, reviewing and transmitting the archived data they do have takes significant time.

In this response, the Companies seek to explain the lateness of this response, not excuse it. The Companies have explained their difficulties to the Auditor and Staff and appreciate their patience. As of this filing, the Companies have produced to the Auditor and Staff all the data they have been able to locate in response to DR-001, subpart (h). While further searching may not yield additional responsive data, the Companies will continue through April 28, 2023 to search for data to produce.

II. The Companies' Challenges in Responding to the Outstanding Data Request

On January 26, 2023, the Auditor served its first data requests on the Companies, including Data Requests -001 through -014. This set, the only set received to date, consists of 33 requests, counting subparts. Thirty-two (32) of the thirty-three (33) requests were completed by March 14. The lone request incomplete as of April 7 was DR-001, subpart (h). This request seeks hourly metered data for every Pilot customer, for every hour of every day from Rider NMB's inception in 2011 to present:

- h) Hourly metered interval load data for each account in (a)² since the inception of Rider NMB, separately, in spreadsheet format.

This request contemplates approximately 13 million rows of data in spreadsheet format. Upon receiving the requests, the Companies began preparing responses, including investigating the availability of the requested historical load data.

² The referenced subpart (a) applies this request to "customers and account numbers (or unique identifiers) that are currently participating in the Rider NMB Pilot program (Pilot), or that have participated in the Pilot at some point in the past, since the inception of the Pilot."

On February 7, 2023, the Companies asked Staff and the auditor for a meeting to discuss the requests. In a meeting on February 9, 2023, the Companies explained their challenges in producing all the requested historical load data. Based on that discussion, the Companies understood that the Auditor's objective was to analyze as much data as possible prior to the Pilot's inception in 2016, and that if they could not provide all the requested data, the Auditor wanted them to provide as much as possible.

After weeks of investigation, the Companies have been unable to locate customer-specific hourly load data prior to December 2015. The Companies maintain customer usage data for twenty-four months. Older data is archived for up to approximately seven years per Company policy, and customer-specific hourly load data older than seven years is not maintained.

Further, with regard to the data the Companies have, the process of locating, retrieving, reviewing, converting, and transmitting the data takes significant time. Customer usage data is not stored in a single location. For instance, information for customers with smart meters is stored separately from information for customers without smart meters. The customer usage data that the Companies do have is not readily available in a format that can be produced to the auditor. Producing the relevant data in a format the Auditor can use requires several steps:

- 1) Identify the relevant customers: The Companies first need to identify all the relevant customers who ever participated in the pilot.
- 2) Identify/locate the data: For each customer, the Companies must determine how much interval data exists and where the data resides. Smart meter data for customers is stored separately from non-smart meter data. Some data is located in data archives, which are separate from the active databases. The different databases and data sources have separate access requirements.

- 3) Retrieve the data: Once the Companies locate the raw data, they need a process to retrieve it. Personnel with the appropriate access rights need to be identified for each data source. Queries need to be written to retrieve the data. Archived data needs to be unarchived one customer at a time and moved into an active database that can be queried. Due to the significant volume of data requested, the retrieval needs to occur in batches.
- 4) Review the data: The Companies also conduct quality control of the retrieved data to review it for reasonableness and to ensure it is responsive to the request.
- 5) Convert the data: The data needs to be converted into a format that can be transferred. Due to the significant volume of the data, it needed to be organized into separate Microsoft Excel files and stored on a shared location where it could be accessed.
- 6) Transfer the data: Finally, again due to the significant volume of the requested data, the Companies needed to develop a process for transferring/transmitting it to Staff and the auditor. This involved setting up a secure site where the files could be transferred. Staff and the auditor were provided instructions on how to create an account to view the information.

As of this filing, the Companies have produced nearly 6 million rows of data in spreadsheet format in response to DR-001, subpart (h), including an average of 5 years of hourly interval usage data for each customer.

III. Conclusion

The Companies have discussed the challenges with responding to the outstanding DR-001, subpart (h) with the Auditor and Staff. The Companies have remained in contact with Staff and the auditor to provide status updates. The Companies appreciate Staff's and the Auditor's understanding. The Companies as of this filing have produced all the data responsive to DR-001

which they have been able to locate. While further searching may not yield additional responsive data, the Companies will continue through April 28, 2023 to search for data to produce, unless directed otherwise.

The Companies remain committed to working diligently to provide any other information the Companies have which the Auditor deems helpful to its analysis.

Respectfully submitted,

/s/ Emily V. Danford

Emily V. Danford (0090747)
Counsel of Record
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
(330) 384-5849
edanford@firstenergycorp.com

*Attorney for Ohio Edison Company, The
Cleveland Electric Illuminating Company and
The Toledo Edison Company*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 17th day of April, 2023 and was served by electronic mail on the following:

rhannon.howard@ohioago.gov
amy.botschnerobrien@ohioago.gov
bojko@carpenterlipps.com
wygonski@carpenterlipps.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
stacie.cathcart@igs.com
evan.betterton@igs.com
michael.nugent@igs.com
jrb@smxblaw.com
mkl@smxblaw.com
dproano@bakerlaw.com
ahaque@bakerlaw.com
eprouthy@bakerlaw.com
connor.semple@occ.ohio.gov
angela.obrien@occ.gov

Attorney Examiners:

megan.addison@puco.ohio.gov
greg.price@puco.ohio.gov
jacqueline.st.john@puco.ohio.gov

/s/ Emily V. Danford

*An Attorney for Ohio Edison Company, The
Cleveland Electric Illuminating Company and
The Toledo Edison Company*

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

4/17/2023 2:48:56 PM

in

Case No(s). 22-0391-EL-RDR

Summary: Response Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company's Response to the Entry of April 7, 2023 electronically filed by Ms. Emily V. Danford on behalf of The Cleveland Electric Illuminating Company and Ohio Edison Company and The Toledo Edison Company .