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FILE

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio
Edison Company, The Cleveland Electric
Illuminating Company and The Toledo
Edison Company for Authority to Provide
for a Standard Service Offer Pursuant to
R.C. § 4928.143 in the Form of an
Electric Security Plan)

PUCO Case No. 23-301-EL-SSO

FAX

UTILITIES FOR ALL AND CITIZENS COALITION'S INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED
UPON FIRST ENERGY < OHIO EDISON COMPANY, THE CLEVELAND
ELECTRIC ILLUMINATING COMPANY AND THE TOLEDO EDISON
COMPANY FIRST SET

(Dated October 12, 2023)

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Utilities for All (UFA) and Citizens' Coalition (CC) submits the following Requests
for Production of Documents and Responses to Interrogatories pursuant to Section 4901-1-20 of
the Ohio Administrative Code and pursuant to all the other regulations related and allowed by
PUCO rules related to discovery. We request for response from First Energy, Ohio Edison
Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company
("FirstEnergy") within 20 calendar days of service of these requests. Responsive documents
should be served by email on UFA's and CC's counsel at the following address: Joseph
Patrick Meissner. 0022366, Counsel of Record, meissnerjoseph@yahoo.com.

All of this Discovery relates to FE ESP CASE IV from 2016 when FE supplied funds
to be used by Citizens Coalition. All of these funds were used by community agencies
such as STEP FORWARD and CLEVELAND HOUSING NETWORK.

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RECEIVED-DOCKING DIVISION

DEFINITIONS

As used herein the following definitions apply:

1. "Document" or "document" when used herein, is used in its customary broad sense, and means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in FirstEnergy's possession, custody, or control regardless of where located; including any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term includes, without limiting the generality of, the foregoing definitions: PowerPoint slides, Excel files, Word documents, PDFs, memoranda, ledgers, worksheets, notebooks, diaries, calendar entries and reminders, appointment entries, registers, charts, tables, papers, agreements, contracts, emails, communications, text messages, instant messages, social media posts, correspondence, financial data, summaries, records, notes, statements and workpapers.
2. "FirstEnergy" or the "Companies" refers to First Energy, Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company.
3. "Community group" or "Community Organization" is a charitable or 501(c) 3 group serving or helping low income families. Examples are "Step" Forward" and "Cleveland Housing Network." (CHN).
4. "Identify": Provide name and address or location and position of individual or

purpose if an organization.

REQUESTS FOR PRODUCTION OF DOCUMENTS and INTERROGATORIES

In accordance with Ohio Adm. Code in its relevant sections, UFA and CC is specifically requesting that all responses be supplemented with subsequently acquired information and documents at the time such information is available.

If any questions, telephone Attorney Joseph Meissner at 1-216-408-6501. Email meissnerjoseph@yahoo.com

PROVIDE RESPONSES FOR YEAR 2015

RPD-01-001. In FE ESP IV in 2015, First Energy through its subordinates The

Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage. The total for this Program was approximately a total of One million dollars a year.

Inter-01-01 Identify the individual(s) for FE that signed that Stipulation resolving the FE ESP IV case including these two programs especially designed to help customers. Identify also to whom these FE's funds were to be paid to:

RESPONSE:

Inter-01-02 Identify the individual(s) for all other parties besides FE that signed that Stipulation resolving the FE ESP IV case including these two programs especially designed to help customers.

RESPONSE

Inter-01-03 State how much FE funded for both of these customer programs in 2015.. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills. Finally, produce copies of all documentation that involved this funding and the transfer of the funding from FE to the community group and/or community organization (including any contracts or agreements).

RESPONSE:

Inter-01-04 State if any funds were left over in 2015 for these programs which was not provided to used and/or used by the community groups. What happened to

these funds? In particular were these allocated to the community groups for succeeding years?

RESPONSE

Inter- 01-05 Did the Community groups receiving these moneys provide any reports or documentation to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such documentation and reports .

RESPONSE:

Inter-01-06 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation to PUCO on these programs to the PUCO for 2015? If so provide copies of all such reports.

FOR YEAR 2016

RPD-02-001. In FE ESP IV in 2016, First Energy through its subordinates The Cleveland Electric Illuminating Company and The Toledo Edison agreed to provide funds to be used for "Fuel Fund" program to furnish credits for

low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-02-01 Identify the individual(s) for FE that signed any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-02-02 State how much FE funded in total for both of these customer programs in 2016. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -02-03 State if any funds were left over in 2016 for these programs which was not provided to and/or used by the community groups. What happened to these

funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 02-04 Did the Community groups receiving these moneys provide any reports or documentation to FE or its subordinate companies for 2016 on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-02-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation to PUCO on these programs to the PUCO for 2016? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2017

RPD-03-001. In FE ESP IV in 2017, First Energy through its subordinate The

Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-03-01 Identify the individual(s) for FE that signed any letters or documentation related to the FE ESP IV case for 2017 including these two programs.

RESPONSE:

Inter-03-02 State how much FE funded in total for both of these customer programs in 2017. . Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -03-03 State if any funds were left over in 2017 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 03-04 Did the Community groups receiving these moneys provide any reports or documentation to FE or its subordinate companies on how in 2017 they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-03-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation to PUCO on these programs to the PUCO for 2017? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2018

RPD-04-001. In FE ESP IV in 2018, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-04-01 Identify the individual(s) for FE that signed any letters or documentation related to the FE ESP IV case in 2018 including these two programs.

RESPONSE:

Inter-04-02 State how much FE funded in total for both of these customer programs in

2018. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -04-03 State if any funds were left over in 2018 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 04-04 Did the Community groups receiving these moneys provide any reports or documentation to FE or its subordinate companies on how in 2018 they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-04-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation to PUCO on these programs to the PUCO for 2018? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2019

RPD-05-001. In FE ESP IV in 2019, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-05-01 Identify the individual(s) in 2019 for FE that signed any letters or documentation related to the FE ESP IV case including these two

programs.

RESPONSE:

Inter-05-02 State how much FE funded in 2018 in total for both of these customer programs in 2019. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -05-03 State if any funds were left over in 2019 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 05-04 Did the Community groups receiving these moneys provide any reports or

documentation in 2019 to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-05-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2019 to PUCO on these programs to the PUCO for 2019? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2020

RPD-06-001. In FE ESP IV in 2020, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers

reduce their bills and usage.

Inter-06-01 Identify the individual(s) in 2020 for FE that signed any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-06-02 State how much FE funded in 2020 in total for both of these customer programs in 2020. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -06-03 State if any funds were left over in 2020 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 06-04 Did the Community groups receiving these moneys provide any reports or documentation in 2020 to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-06-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2020 to PUCO on these programs to the PUCO for 2020? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2021

RPD-07-001. In FE ESP IV in 2021, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be

disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-07-01 Identify the individual(s) in 2021 for FE that signed any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-07-02 State how much FE funded in 2021 in total for both of these customer programs in 2021. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -07-03 State if any funds were left over in 2021 for these programs which was not

provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter-07-04 Did the Community groups receiving these moneys provide any reports or documentation in 2021 to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-07-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2021 to PUCO on these programs to the PUCO for 2021? If so provide copies of all such reports.

RESPONSE

FOR YEAR 2022

RPD-08-001. In FE ESP IV in 2022, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-08-01 Identify the individual(s) in 2022 for FE that signed any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-08-02 State how much FE funded in 2022 in total for both of these customer programs in 2022. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -08-03 State if any funds were left over in 2022 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 08-04 Did the Community groups receiving these moneys provide any reports or documentation in 2022 to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-08-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2022 to PUCO on these programs to the PUCO for 2021? If so provide copies of all

such reports.

RESPONSE

FOR YEAR 2023

RPD-09-001. In FE ESP IV in 2023, First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-09-01 Identify the individual(s) in 2023 for FE that signed any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-09-02 State how much FE funded in 2023 in total for both of these customer programs in 2023. Identify what community groups received this funding and how much each actually received, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -09-03 State if any funds were left over in 2023 for these programs which was not provided to and/or used by the community groups. What happened to these funds? In particular were these allocated to the customer groups for succeeding years?

RESPONSE

Inter- 09-04 Did the Community groups receiving these moneys provide any reports or documentation in 2023 to FE or its subordinate companies on how they used these moneys and the results they achieved. Please provide copies of all such reports.

RESPONSE:

Inter-09-05 Did FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2023 to PUCO on these programs to the PUCO for 2023? If so provide copies of all such reports.

RESPONSE**FOR YEAR 2024**

RPD-04-001. In FE ESP IV in 2024 First Energy through its subordinate The Cleveland Electric Illuminating Company agreed to provide funds to be used for "Fuel Fund" program to furnish credits for low-income customers (facing disconnection) on their electric bills so they would not be disconnected, This was approximately \$400,000 annually as well as almost \$50,000 to help with administrative expenses for the community agencies administering the program. Secondly, the Companies funded a Customer Advisory program which would provide funds to help customers reduce their bills and usage.

Inter-09-01 Identify the individual(s) in 2023 for FE or for 2024 that have or are going

to sign any letters or documentation related to the FE ESP IV case including these two programs.

RESPONSE:

Inter-09-02 State how much FE funded in 2024 in total for both of these customer programs in 2024. Identify what community groups are going to receive or have received this funding and how much each actually received or will receive, whether as credits to customer bills under the Fuel Fund Program or as funds to be used by the community groups to help customers reduce their usage and bills..

RESPONSE:

Inter -09-03 State if any funds that were left over in 2023 for these programs which will be provided to and/or used by the community groups in 2024? If not, what will happen to these funds? In particular were or will these be allocated to the customer groups for succeeding years?

RESPONSE

Inter- 09-04 Have the Community groups receiving these moneys up to now provided any reports or documentation to FE or its subordinate companies on how they plan to use these moneys and the results they expect to achieve.
Please provide copies of all such reports.

RESPONSE:

Inter-09-05 Will FE or its subordinate companies and the community groups whether together or separately provide any reports or documentation in 2023 or 2024 to PUCO on these programs to the PUCO

RESPONSE

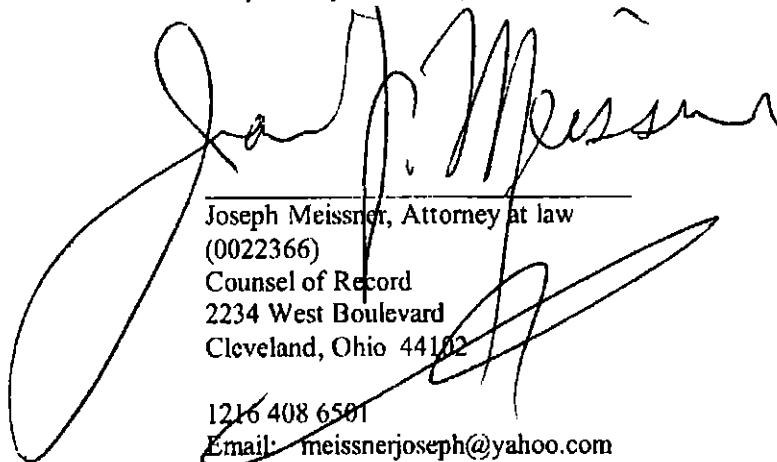
FOR YEAR 2024

Inter 10-01 Has FE or CEI allocated any funding for community organizations for the two programs in 2024? If so, how much funding has FE or CEI allocated or will allocate for the two programs?

Inter 10-02 If so, how much is allocated to each agency and identify which agency?

Dated: October 12, 2023

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Joseph Meissner', is written over the printed contact information.

Joseph Meissner, Attorney at law
(0022366)
Counsel of Record
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Cleveland, Ohio 44102

1216 408 6501

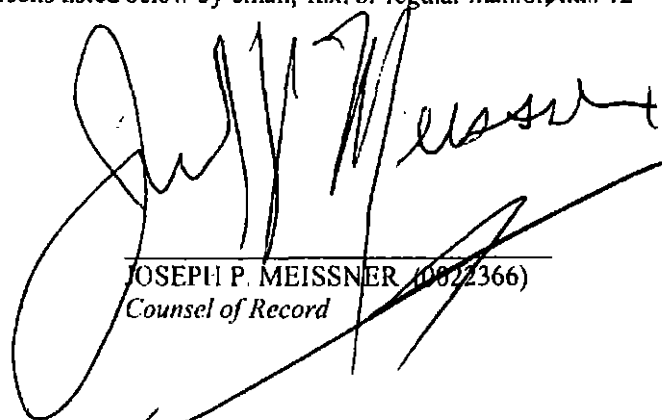
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Willing to Accept Service by Email

**COUNSEL FOR CITIZENS COALITION
AND UTILITIES FOR ALL**

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Interrogatories and Requests for Production of Documents Propounded upon the First Energy as well as Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (First Set), was served upon the persons listed below by email, fax, or regular mail on this 12th day of October 2023.



JOSEPH P. MEISSNER (0822366)
Counsel of Record

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