

NRG Set 01

Case No. 23-0301-EL-SSO
**In the Matter of the Application of the 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**

RESPONSE TO REQUESTS FOR ADMISSIONS

NRG Set 01– Admit that pricing signals incentivize residential customers to shift their
RFA-003 electricity use to off-peak periods.

Response: Objection. The Request is vague and ambiguous in its use of the term
“incentivize.” Subject to and without waiving the foregoing objections, the
Companies admit that pricing signals can incentivize customers to shift their
electricity use peak to lower price periods which could include off-peak periods.
The Companies deny any allegations not expressly admitted herein.

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in

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Summary: Exhibit NRG Exh 3 electronically filed by Mr. Ken Spencer on behalf of
Armstrong & Okey, Inc..