

FILE

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Date of Hearing: 11/9/2023

PUCO

Case No. 23-301-EL-550

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

List of Exhibits Being Filed:

Volume III

DELC Exhibits 1, 2 ✓CEISA Exhibits 1, 2, 3, 4, 5, 7, 8 ✓OMAE6 Exhibits 4, 5, 6, 8, 9, 10, 11, 12 ✓

Reporter's Signature:

Karen Sue Gibson

Date Submitted:

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Date Processed

11/22/23

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 : Case No. 23-301-EL-SSO  
Authority to Establish a :  
Standard Service Offer :  
Pursuant to R.C. 4928.143 :  
in the Form of an Electric:  
Security Plan. :

- - -

PROCEEDINGS

before Mr. Gregory Price, Ms. Megan Addison, and  
Ms. Jacky Werman St. John, Attorney Examiners, at the  
Public Utilities Commission of Ohio, 180 East Broad  
Street, Room 11-A, Columbus ohio, called at 9:18 a.m.  
on Thursday, November 9, 2023.

- - -

VOLUME III

- - -

ARMSTRONG & OKEY, INC.  
222 East Town Street, Second Floor  
Columbus, Ohio 43215-5201  
(614) 224-9481

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Nucor Set 01

**Answer Prepared By: Edward B. Stein, Brandon S. McMillen and Edward C. Miller**  
**As to Objections: Trevor Alexander**

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**Nucor Set  
01 – INT-  
004**

Regarding the Companies' proposal to no longer serve as the CSP for Rider ELR customers:

- (a) Aside from customer notifications, penalties, or testing requirements as referred to at page 5, lines 20-21 of Witness Stein's testimony, what other activities do the Companies perform in serving as the CSP for Rider ELR customers?
- (b) How long have the Companies been serving as the CSP for Rider ELR customers?
- (c) Explain in detail any problems that the Companies have encountered in serving as the CSP for Rider ELR customers.
- (d) Identify any costs the Companies incur in serving as the CSP for Rider ELR customers.
- (e) Identify the number of employees used and the number of manhours spent by the Companies in serving as the CSP for Rider ELR customers.
- (f) Could the Companies continue to serve as the CSP for Rider ELR customers if the Commission directs them to do so? If not, please explain why in detail.
- (g) Aside from Rider ELR load, have the Companies offered any other demand response or energy efficiency resources into the PJM markets and/or served as the CSP for any other customers? If so, please explain in detail.
- (h) Do the Companies intend to offer any energy efficiency and/or demand responses resources into the PJM markets during the proposed term of ESP V? If so, please explain in detail.
- (i) Did the Companies consult with their current Rider ELR customers concerning the requirement that Rider ELR customers participate in the PJM load management programs through their own CSP? If so, please describe how they were consulted and provide any input provided and any related documents.

**Response:** a. The companies also determine the amount of curtailable load to offer into RPM auctions and set the price strategy of how to offer those assets into the

RPM auctions. The Companies must then monitor PJM emergency operations notifications in order to curtail customers when required.

- b. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies interpret this Request as seeking information regarding when the Companies began serving as the CSP for all Rider ELR customers, and not requesting information regarding any specific customer's service dates. The Companies began managing the load of customers participating in Rider ELR beginning with the inception of Rider ELR on June 1, 2009.
- c. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. This Request is vague and ambiguous in its use of the term "problems." The Companies object to this Request that purports to require a detailed, narrative response. *Penn Central Transp. Co. v. Armco Steel Corp.*, 27 Ohio Misc. 76, 77 (C.P. 1971). The Request is overbroad and unduly burdensome in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, there have been metering, dispatch, and customer performance issues. For example, the Companies experienced a malfunction of the automated notification system for a recent PJM emergency event causing response to the event to be delayed.
- d. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Request is overbroad and unduly burdensome in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, from June 2016 – May 2023, the Companies have incurred costs totaling \$1,642,465 related to charges from PJM and costs associated with the Companies' notification system for Emergency Curtailment Events. These costs are recovered through Rider DSE1.
- e. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Request is overbroad and unduly burdensome in requesting identification of the "number of manhours spent by the Companies in serving as the CSP for Rider ELR customers" and in requesting information over a period of more than 14 years. Subject to and without waiving the foregoing objections, the Companies do not track the number of employees or personnel hours spent on serving as the CSP for Rider ELR customers. The groups within the Companies that are involved in serving as the CSP for Rider ELR customers include, but are not limited to, Rates and Regulatory Affairs, Legal, Energy Efficiency, Dispatch, Settlements, Customer Support, Accounting, Billing, Customer Service, and Supply Chain.

- f. Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, the request calls for speculation. Subject to and without waiving the foregoing objections, yes.
- g. Objection. This Request is vague and ambiguous in its use of the phrase “offered any other demand response or energy efficiency resources into the PJM markets.” Subject to and without waiving the foregoing objections, yes, the Companies historically offered qualifying energy efficiency resources associated with programs implemented under Ohio Revised Code Section 4928.66 into the PJM capacity markets. Because those programs have ended and the associated resources no longer qualify for participation, that effort has been discontinued. The Companies have not served as CSP for any other customers.
- h. Objection. This Request is vague and ambiguous in its use of the phrase “offered any other demand response or energy efficiency resources into the PJM markets.” Subject to and without waiving the foregoing objections, yes, assuming the energy efficiency programs proposed as part of ESP V are approved as filed. Please see the Testimony of Edward Miller at p. 29 for a detailed explanation.
- i. Objection. This Request is vague and ambiguous in its use of the term “consult” and the phrase “the requirement that Rider ELR customers participate in the PJM load management programs through their own CSP.” The Companies interpret this request to seek information regarding the Companies’ communications to current ELR customers regarding the Companies’ Rider ELR proposal in ESP V. Subject to and without waiving the foregoing objections, yes. In ESP V pre-filing meetings with interested stakeholders, the Companies solicited feedback on Rider ELR and presented their plans for Rider ELR in ESP V. Separate from these ESP V discussions, the Companies have also consulted with current Rider ELR customers about participating in PJM load management programs through their own CSP beyond the expiration of ESP IV, and in connection with a customer’s intent to participate in the PJM Synchronized Reserve Market..

OELC Set 01

Answer Prepared By: Brandon McMillen

As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

**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**

**ANSWERS TO INTERROGATORIES**

**OELC Set 01– INT-011** Please identify the total load in MW that was curtailed or interrupted in FirstEnergy territory on December 23, 2022, as a result of any interruptible notice originating from PJM (including, but not limited to, any Pre-Emergency Load Management Reduction Action, Emergency Load Management Reduction Action or NERC level EEA2 initiated or issued by PJM at any time on December 23, 2022).

**Response:** Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The request also seeks information not in the Companies' possession or control. Subject to and without waiving the foregoing objections, the Companies only have information regarding load curtailed or interrupted as a result of PJM notices as it relates to Rider ELR customers. The Companies did not initiate an Emergency Curtailment Event for their Rider ELR customers on December 23, 2022. Also, please see the Companies' response to OELC Set 01-INT-021.

**Case No. 23-0301-EL-SSO**

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**ANSWERS TO INTERROGATORIES**

- OELC Set 01– INT-012** For the load identified in response to ROG-01-011, please identify:
- a ) the total number of FirstEnergy accounts included in that curtailed or interrupted load;
  - b ) for the accounts included in the response to subpart (a) of this interrogatory, the total number of those accounts that were participating or being served under FirstEnergy’s Rider ELR on December 23, 2022;
  - c ) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the total load in MW that was curtailed or interrupted at any time on December 23, 2022;
  - d ) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the cumulative total number of hours that those accounts were curtailed or interrupted at any time on December 23, 2022;
  - e ) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the peak load contribution (PLC) values for each account for the current 2022/2023 delivery year and future 2023/2024 delivery year;
  - f ) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy’s Rider ELR, the monthly billed demand for each account for the 12 billing cycles with service periods ending in June 2022 through May 2023; and
  - g ) a detailed itemization of all payments, revenues and/or penalties received by FirstEnergy from PJM related to the load curtailment on December 23, 2022, or the interruptible notice originating from PJM on that date.

- Response:**
- a) Not applicable.
  - b) Not applicable.
  - c) Not applicable.

- d) Not applicable.
- e) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, not applicable.
- f) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, not applicable.
- g) Objection. This Request is vague and ambiguous in its use of the phrase “or the interruptible notice originating from PJM on that date.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see the Companies’ response to OELC Set 01-INT-014.



**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OELC Set 01– INT-013** Please identify the total load in MW that was curtailed or interrupted in FirstEnergy territory on December 24, 2022, as a result of any interruptible notice originating from PJM (including, but not limited to, any Pre-Emergency Load Management Reduction Action, Emergency Load Management Reduction Action or NERC level EEA2 initiated or issued by PJM at any time on December 24, 2022).<sup>1</sup>

**Response:** Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies only have information regarding load curtailed or interrupted as a result of PJM notices as it relates to Rider ELR customers. See the Companies' response to OCC Set 05-INT-006(g).

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<sup>1</sup> Please refer to this publicly-available PJM presentation if further details are required on the terms used in this interrogatory: <https://www.pjm.com/-/media/committees-groups/committees/mic/2023/20230111/item-0x---winter-storm-elliott-overview.ashx>

**Case No. 23-0301-EL-SSO**  
**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**

**ANSWERS TO INTERROGATORIES**

**OELC Set  
01– INT-014**

For the load identified in response to ROG-01-013, please identify:

- a) the total number of FirstEnergy accounts included in that curtailed or interrupted load;
- b) for the accounts included in the response to subpart (a) of this interrogatory, the total number of those accounts that were participating or being served under FirstEnergy's Rider ELR on December 24, 2022;
- c) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy's Rider ELR, the total load in MW that was curtailed or interrupted at any time on December 24, 2022;
- d) for the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy's Rider ELR, the cumulative total number of hours that those accounts were curtailed or interrupted at any time on December 24, 2022;
- e) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy's Rider ELR, the peak load contribution (PLC) values for each account for the current 2022/2023 delivery year and future 2023/2024 delivery year;
- f) for each of the accounts included in the response to subpart (b) of this interrogatory as participating or being served under FirstEnergy's Rider ELR, the monthly billed demand for each account for the 12 billing cycles with service periods ending in June 2022 through May 2023; and
- g) a detailed itemization of all payments, revenues and/or penalties received by FirstEnergy from PJM related to the load curtailment on December 24, 2022, or the interruptible notice originating from PJM on that date.

**Response:**

Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections:

- a) 24 ELR customers were curtailed.

- b) See the Companies' response to subpart (a).
- c) See the Companies' response to OCC Set 05-INT-006(g).
- d) See the Companies' response to OCC Set 05-INT-006(e).
- e) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, see OELC Set 01-INT-014 Attachment 1 Confidential.
- f) Objection. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, see OELC Set 01-INT-014 Attachment 2 Confidential.
- g) Objection. This Request is vague and ambiguous in its use of the phrase "or the interruptible notice originating from PJM on that date." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies received approximately \$11.4M in payments from PJM for the curtailment events in December 2022.

OECSP	
3/1/2023 0:00	\$ (2,151,718.16)
4/1/2023 0:00	\$ (2,944,130.26)
5/1/2023 0:00	\$ (2,721,728.86)
6/1/2023 0:00	\$ (1,405,837.57)
7/1/2023 0:00	\$ (1,086,346.53)
8/1/2023 0:00	\$ (1,132,623.12)
	\$ (11,442,384.50)

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**ANSWERS TO INTERROGATORIES**

**OELC Set 01– INT-015** Please identify the number of FirstEnergy accounts that were participating or being served under FirstEnergy’s Rider ELR on December 23, 2022, that failed to curtail or interrupt load on that day in response to any interruptible notice originating from PJM or FirstEnergy, and for those accounts identify the total aggregate amount of load in MW that should have been curtailed or interrupted on that day.

**Response:** None. See the Companies’ response to OELC Set 01-INT-021.

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OELC Set 01– INT-016** Please identify the number of FirstEnergy accounts that were participating or being served under FirstEnergy’s Rider ELR on December 24, 2022, that failed to curtail or interrupt load on that day in response to any interruptible notice originating from PJM or FirstEnergy, and for those accounts identify the total aggregate amount of load in MW that should have been curtailed or interrupted on that day.

**Response:** None.

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OELC Set 01– INT-017** Referring to FirstEnergy’s proposal for ESP V that participants in Rider ELR must participate in PJM load management programs through a third-party curtailment service provider, please describe how customers that either do not have a nomination for emergency demand response or whose nomination value is de minimis, and thus may not be eligible to participate in a PJM load management program, can continue to participate in Rider ELR during ESP V.

**Response:** Objection. The Companies object to this Request that purports to require a detailed, narrative response. Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (C.P. 1971). Subject to and without waiving the foregoing objections, PJM capacity market demand response nominations are made on an aggregated or portfolio level by PJM zone that involves the evaluation of all individual demand response customers. A customer with a zero or de minimis individual load response capability can still participate in and benefit from a PJM load management program. These customers can help to contribute their summer and/or winter performance capabilities to the aggregated load response portfolio and allow additional capabilities of other customers in the resource portfolio to be utilized by reducing down to their firm load during an emergency event.

RESA 02  
1

**RESA Set 02**  
**Answer Prepared By: Brandon McMillen**  
**As to Objections: Trevor Alexander**

**Case No. 23-0301-EL-SSO**  
**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**

**ANSWERS TO INTERROGATORIES**

**RESA Set 02- INT-010** For the Demand Side Management and Energy Efficiency Rider, identify the total annual revenue by year back to 2009, collected from customers through the rider.

**Response:** Objection. This Request is vague and ambiguous in its use of the term "Demand Side Management and Energy Efficiency Rider." Further, this Request is overly broad and unduly burdensome in requesting "the total annual revenue by year back to 2009, collected from customers through the rider." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see RESA Set 02-INT-010 Attachment 1.

CEI	Rate Schedule	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
	RS	\$ 9,901,531	\$ 16,433,206	\$ 13,353,285	\$ 21,264,844	\$ 15,106,023	\$ 11,403,719	\$ 23,477,472	\$ 36,319,512	\$ 35,517,236	\$ 16,601,320	\$ (3,580)	\$ 207	
	GS	\$ 3,183,241	\$ 17,287,794	\$ 12,439,442	\$ 10,372,634	\$ 14,198,125	\$ 6,741,461	\$ 14,437,110	\$ 17,287,663	\$ 16,156,537	\$ 6,829,681	\$ (45,599)	\$ 3,602	
	GP	\$ 127,675	\$ 941,344	\$ (489,846)	\$ 536,688	\$ 1,590,711	\$ 412,965	\$ 1,050,870	\$ 386,773	\$ 373,493	\$ 636,006	\$ 2,563	\$ 2,761	
	GSU	\$ 2,091,927	\$ 10,125,587	\$ (577,175)	\$ 3,477,524	\$ 2,294,968	\$ 1,137,351	\$ 2,875,305	\$ 2,052,059	\$ 1,980,564	\$ 2,624,860	\$ 6,082	\$ -	
	GIT	\$ 150,396	\$ 2,414,166	\$ (2,100,307)	\$ 904,824	\$ 1,584,902	\$ (204,465)	\$ 1,015,645	\$ 532,780	\$ 972,289	\$ 754,248	\$ (29,927)	\$ -	
	STL	\$ -	\$ -	\$ -	\$ 79,777	\$ (1,168)	\$ 2,558	\$ 36,058	\$ (59,760)	\$ 35,356	\$ 35,356	\$ 1,171	\$ -	
	TRF	\$ 3,411	\$ 1,423	\$ 41,779	\$ 179,271	\$ 27,670	\$ 139,633	\$ 113,229	\$ (24,016)	\$ (19,618)	\$ 113,175	\$ (427)	\$ -	
	Total	\$ 15,458,181	\$ 47,203,520	\$ 22,699,354	\$ 36,815,562	\$ 34,801,231	\$ 19,633,225	\$ 43,005,691	\$ 56,614,532	\$ 62,614,532	\$ 55,044,472	\$ 27,594,646	\$ (69,987)	\$ 6,571
	OE	Rate Schedule	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RS		\$ 16,044,355	\$ 29,556,167	\$ 7,274,631	\$ 28,913,388	\$ 19,276,382	\$ 19,819,020	\$ 37,283,084	\$ 40,358,653	\$ 41,558,412	\$ 21,366,184	\$ 8,432	\$ 227	
GS		\$ 5,912,081	\$ 13,599,365	\$ 10,785,919	\$ 10,912,007	\$ 11,067,874	\$ 3,417,938	\$ 15,925,032	\$ 12,972,097	\$ 15,870,283	\$ 10,948,012	\$ (80,672)	\$ 774	
GP		\$ 4,860,313	\$ 4,466,479	\$ 2,420,855	\$ 3,602,716	\$ 5,410,034	\$ 1,273,428	\$ 3,124,589	\$ 5,534,119	\$ 4,614,018	\$ 2,810,376	\$ 1,295	\$ -	
GSU		\$ 1,479,434	\$ 947,428	\$ 438,694	\$ 2,219,977	\$ 790,766	\$ (623,502)	\$ 666,089	\$ 723,207	\$ 1,279,021	\$ 491,772	\$ (600)	\$ -	
GIT		\$ 3,986,825	\$ 5,590,487	\$ (1,153,041)	\$ 6,814,239	\$ 4,295,971	\$ 1,850,765	\$ 3,395,121	\$ 4,386,439	\$ 3,508,269	\$ 3,947,294	\$ 7,061	\$ -	
STL		\$ -	\$ -	\$ 37,683	\$ 65,954	\$ 1,929	\$ 4,047	\$ 16,665	\$ 26,340	\$ 40,038	\$ 10,757	\$ (25)	\$ 1	
TRF		\$ 14,869	\$ 1,956	\$ 60,967	\$ 1,813	\$ 9,126	\$ 4,871	\$ 30,244	\$ 404	\$ 30,415	\$ 10,861	\$ (71)	\$ -	
Total		\$ 32,297,876	\$ 54,161,883	\$ 19,866,707	\$ 52,530,093	\$ 40,852,081	\$ 25,746,567	\$ 60,440,824	\$ 64,001,258	\$ 66,900,456	\$ 39,585,256	\$ (64,581)	\$ 1,001	
TE		Rate Schedule	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	RS	\$ 4,351,647	\$ 6,109,604	\$ 5,629,861	\$ 8,231,744	\$ 706,666.4	\$ 8,500,815	\$ 12,577,392	\$ 17,762,225	\$ 20,918,527	\$ 11,453,948	\$ 5,710	\$ 9	
	GS	\$ 964,150	\$ 2,210,264	\$ 3,710,471	\$ 4,450,984	\$ 383,650.19	\$ 1,770,097	\$ 5,692,617	\$ 5,214,414	\$ 6,197,090	\$ 2,418,241	\$ (10,513)	\$ 19	
	GP	\$ 1,924,737	\$ 1,277,430	\$ 3,163,642	\$ 1,338,437	\$ 238,657.13	\$ 466,735	\$ 1,880,153	\$ 2,020,363	\$ 1,449,430	\$ 878,324	\$ (11,253)	\$ 1	
	GSU	\$ 36,404	\$ 1,458,797	\$ 197,343	\$ (142,365)	\$ 368,71.88	\$ 9,305	\$ 19,823	\$ 52,336	\$ 61,802	\$ 51,609	\$ (23,229)	\$ -	
	GIT	\$ 1,232,116	\$ 4,289,661	\$ (5,232,125)	\$ 6,486,676	\$ 295,970.97	\$ 1,663,830	\$ 953,793	\$ 3,594,684	\$ 2,017,851	\$ 249,267	\$ (364,391)	\$ -	
	STL	\$ -	\$ -	\$ 7,782	\$ 13,591	\$ 2353.34	\$ 789	\$ 5,697	\$ 8,950	\$ 10,555	\$ 52,414	\$ (595)	\$ 1	
	TRF	\$ 480	\$ 977	\$ 3,163	\$ (1,360)	\$ 556.91	\$ 618	\$ 574	\$ (390)	\$ 446	\$ 208	\$ (4)	\$ -	
	Total	\$ 8,509,534	\$ 15,341,733	\$ 7,480,137	\$ 20,377,708	\$ 16,289,382	\$ 12,412,189	\$ 21,080,049	\$ 28,652,583	\$ 30,655,700	\$ 15,104,010	\$ (404,275)	\$ 30	
	Total	Rate Schedule	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RS		\$ 30,297,532	\$ 52,098,977	\$ 26,257,777	\$ 58,409,976	\$ 41,449,091	\$ 39,723,554	\$ 73,287,948	\$ 94,440,390	\$ 97,994,174	\$ 49,421,451	\$ 10,292	\$ 443	
GS		\$ 10,059,472	\$ 33,097,424	\$ 26,935,832	\$ 25,735,626	\$ 29,102,549	\$ 11,929,496	\$ 36,054,760	\$ 35,474,174	\$ 38,223,911	\$ 20,195,933	\$ (136,784)	\$ 4,995	
GP		\$ 6,912,724	\$ 6,680,254	\$ 5,094,651	\$ 5,477,841	\$ 9,387,317	\$ 2,153,128	\$ 6,055,612	\$ 7,941,256	\$ 6,436,941	\$ 4,324,707	\$ (7,395)	\$ 2,763	
GSU		\$ 3,607,764	\$ 12,531,811	\$ 59,862	\$ 5,555,136	\$ 3,122,606	\$ 523,153	\$ 3,561,218	\$ 2,877,602	\$ 3,321,387	\$ 3,168,241	\$ (17,747)	\$ -	
GIT		\$ 5,369,337	\$ 12,294,314	\$ (8,485,473)	\$ 14,205,739	\$ 8,840,664	\$ 3,310,132	\$ 5,364,559	\$ 8,513,903	\$ 6,498,408	\$ 4,950,810	\$ (387,256)	\$ -	
STL		\$ -	\$ -	\$ 77,640	\$ 159,322	\$ 3,114	\$ 7,395	\$ 58,420	\$ 95,049	\$ 114,565	\$ 98,526	\$ 550	\$ 1	
TRF		\$ 18,761	\$ 4,356	\$ 105,910	\$ 179,724	\$ 37,352	\$ 145,122	\$ 144,048	\$ (24,001)	\$ 11,243	\$ 124,244	\$ (502)	\$ -	
Total		\$ 56,265,591	\$ 116,707,136	\$ 50,046,198	\$ 109,723,363	\$ 91,942,694	\$ 57,791,981	\$ 124,526,563	\$ 149,768,373	\$ 152,600,628	\$ 82,283,912	\$ (538,842)	\$ 7,602	



CEI	Rate Schedule	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	Residential	\$ 1,061,525	\$ 1,180,870	\$ 2,436,442	\$ 2,543,166	\$ 3,469,166	\$ 2,171,183	\$ 3,317,022	\$ 3,118,473	\$ 3,644,079	\$ 4,104,316	\$ 3,672,199	\$ 3,627,132	\$ 2,356,645	\$ 3,364,845
	Commercial	\$ 926,533	\$ 983,392	\$ 2,895,548	\$ 2,964,202	\$ 4,158,915	\$ 2,568,180	\$ 3,923,819	\$ 3,636,447	\$ 4,389,800	\$ 4,546,526	\$ 4,117,496	\$ 3,561,656	\$ 2,180,893	\$ 3,268,337
	Industrial	\$ 1,273,501	\$ 1,435,891	\$ 2,407,405	\$ 2,553,020	\$ 3,700,243	\$ 2,283,548	\$ 2,736,804	\$ 2,294,018	\$ 2,981,070	\$ 3,182,273	\$ 2,819,749	\$ 2,390,596	\$ 1,550,373	\$ 2,262,960
	Lighting	\$ 30,222	\$ 30,543	\$ 62,845	\$ 61,594	\$ 90,310	\$ 53,522	\$ 86,251	\$ 76,067	\$ 92,441	\$ 100,181	\$ 94,146	\$ 87,247	\$ 57,755	\$ 80,969
Total	\$ 3,291,780	\$ 3,630,696	\$ 7,802,241	\$ 8,121,982	\$ 11,418,633	\$ 7,076,432	\$ 10,063,896	\$ 9,125,005	\$ 11,107,390	\$ 11,933,286	\$ 10,803,590	\$ 9,666,630	\$ 6,145,666	\$ 8,977,171	
OE	Rate Schedule	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	Residential	\$ 1,758,429	\$ 1,956,892	\$ 4,045,757	\$ 4,201,566.7	\$ 5,839,267	\$ 3,657,388	\$ 5,588,615	\$ 5,180,361	\$ 6,109,215	\$ 6,984,400	\$ 6,278,268	\$ 6,131,199	\$ 3,955,475	\$ 5,739,279
	Commercial	\$ 1,383,394	\$ 1,441,194	\$ 2,867,838	\$ 2,989,019.3	\$ 4,169,707	\$ 2,603,015	\$ 4,020,296	\$ 3,717,094	\$ 4,449,015	\$ 4,754,768	\$ 4,326,272	\$ 3,707,669	\$ 2,374,487	\$ 3,539,607
	Industrial	\$ 1,139,902	\$ 1,342,491	\$ 3,029,123	\$ 3,054,117.6	\$ 4,345,130	\$ 2,960,294	\$ 3,742,014	\$ 2,955,810	\$ 3,731,309	\$ 3,915,072	\$ 3,596,272	\$ 2,894,579	\$ 1,788,984	\$ 2,805,517
	Lighting	\$ 29,737	\$ 30,119	\$ 61,557	\$ 63,548.6	\$ 86,996	\$ 54,685	\$ 84,866	\$ 76,371	\$ 95,265	\$ 100,774	\$ 94,266	\$ 89,900	\$ 55,731	\$ 80,517
Total	\$ 4,311,462	\$ 4,770,696	\$ 10,004,276	\$ 10,308,282	\$ 14,441,100	\$ 9,275,382	\$ 13,435,790	\$ 11,929,635	\$ 14,384,806	\$ 15,755,015	\$ 14,295,079	\$ 12,823,347	\$ 8,204,088	\$ 12,164,918	
TE	Rate Schedule	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	Residential	\$ 478,843	\$ 533,781	\$ 1,112,219	\$ 1,150,468	\$ 1,572,685	\$ 995,754	\$ 1,492,433.32	\$ 1,407,078	\$ 1,644,616	\$ 1,892,682	\$ 1,659,533	\$ 1,679,218	\$ 1,087,087	\$ 1,580,436
	Commercial	\$ 523,635	\$ 554,359	\$ 878,522	\$ 899,349	\$ 1,240,436	\$ 784,095	\$ 1,190,816.46	\$ 1,106,772	\$ 1,318,857	\$ 1,381,985	\$ 1,254,062	\$ 1,083,372	\$ 692,028	\$ 1,036,096
	Industrial	\$ 663,915	\$ 771,183	\$ 1,867,207	\$ 1,953,768	\$ 2,897,125	\$ 1,787,431	\$ 1,954,665.76	\$ 1,522,566	\$ 1,997,610	\$ 1,870,284	\$ 1,512,410	\$ 1,378,276	\$ 853,608	\$ 1,136,045
	Lighting	\$ 10,281	\$ 10,474	\$ 21,718	\$ 22,851	\$ 32,145	\$ 20,968	\$ 31,199.02	\$ 28,785	\$ 34,816	\$ 35,961	\$ 34,869	\$ 32,517	\$ 15,511	\$ 20,170
Total	\$ 1,676,673	\$ 1,869,797	\$ 3,879,667	\$ 4,026,436	\$ 5,742,390	\$ 3,588,248	\$ 4,669,125	\$ 4,065,200	\$ 4,995,898	\$ 5,180,913	\$ 4,500,875	\$ 4,173,384	\$ 2,648,233	\$ 3,948,747	
Total	Rate Schedule	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	Residential	\$ 3,298,796	\$ 3,671,543	\$ 7,594,419	\$ 7,893,231	\$ 10,881,117	\$ 6,824,325	\$ 10,398,080	\$ 9,705,912	\$ 11,397,910	\$ 12,981,398	\$ 11,650,001	\$ 11,437,549	\$ 7,429,206	\$ 10,684,559
	Commercial	\$ 2,833,562	\$ 2,978,945	\$ 6,641,909	\$ 6,852,570	\$ 9,569,058	\$ 5,955,290	\$ 9,134,931	\$ 8,460,312	\$ 10,157,673	\$ 10,683,279	\$ 9,797,831	\$ 8,352,697	\$ 5,247,408	\$ 7,820,101
	Industrial	\$ 3,077,318	\$ 3,549,565	\$ 7,303,735	\$ 7,560,905	\$ 10,942,497	\$ 7,031,772	\$ 8,433,483	\$ 6,772,393	\$ 8,709,989	\$ 8,967,630	\$ 7,928,431	\$ 6,663,451	\$ 4,192,376	\$ 6,404,500
	Lighting	\$ 70,239	\$ 71,137	\$ 146,120	\$ 147,994	\$ 209,451	\$ 129,175	\$ 202,315	\$ 181,223	\$ 222,522	\$ 236,917	\$ 223,281	\$ 209,663	\$ 128,997	\$ 181,657
Total	\$ 9,279,915	\$ 10,271,189	\$ 21,686,183	\$ 22,456,700	\$ 31,602,123	\$ 19,940,062	\$ 28,168,810	\$ 25,119,840	\$ 30,488,094	\$ 32,869,224	\$ 29,599,543	\$ 26,663,361	\$ 16,997,987	\$ 25,090,836	

RESA 64.  
4

PUCO DR-006

**Case No. 23-0301-EL-SSO**

**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**

**RESPONSES TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S  
DATA REQUESTS**

**PUCO  
DR-006**

1. Regarding the Economic Load Reduction (ELR) program:
  - a. For each year since the start of ESP IV, what is the total amount of credits paid to ELR participants (including credits under Rider EDR and Rider DSE)?
  - b. What is the total curtailable load for current ELR participants?
  - c. Identify all current ELR participants.
  - d. State the curtailable load for each current ELR participant.
  - e. For each year since the start of ESP IV, identify all ELR participants and the amount of annual credits received by each participant (under each of Rider EDR and Rider DSE).
  - f. For each current ELR participant, to the extent known by the Companies, state whether the participant is a member of Ohio Energy Group, Ohio Energy Leadership Council (formerly Industrial Energy Users-Ohio), Ohio Manufacturers' Association, or none of the above.
  - g. Since the beginning of ESP IV, how many times have the Companies called on ELR participants to interrupt each year?
  - h. Page 6 of the Testimony of Edward Stein states: "To date, the Companies have not called a load interruption event on their distribution system independent of PJM under the provisions of Rider ELR during the term of ESP IV."
    - i. Did the Companies call any load interruption events on their distribution system independent of PJM under the provisions of Rider ELR prior to the start of ESP IV?
    - ii. If so, how many times, under what circumstances, and on what dates?
  - i. Page 14 of the Testimony of Brandon McMillen states: "Over the term of ESP IV, average annual PJM revenue offsets for Rider ELR resources credited to customers were approximately \$2 million." Please provide the exact amount of credits for each year of ESP IV.

**Response:**

- a. See PUCO DR-006 Attachment 1.
- b. See PUCO DR-006 Attachment 2 Confidential.
- c. See PUCO DR-006 Attachment 2 Confidential.
- d. See PUCO DR-006 Attachment 2 Confidential.

- e. See PUCO DR-006 Attachment 2 Confidential for the credits ELR customers received through Riders ELR and EDR(b) for the period February 2019 through May 2023. The Companies are working on locating information prior to February 2019..
- f. The Companies' latest records of the membership of Rider ELR - customers in the referenced customer groups are provided in PUCO DR-006 Attachment 2 Confidential. Membership may change without notification to the Companies.
- g. See the following table:

June 16 - May 17*	June 17 - May 18*	June 18 - May 19*	June 19 - May 20**	June 20 - May 21*	June 21 - May 22*	June 22 - May 23
1	1	1	0	1	1	1

\* PJM Test Event

\*\*For PJM year 2019/2020, the Companies received waivers of the Rider ELR testing requirements due to COVID-19 implications. See Case No. 20-1025-EL-WVR

- h.
  - i. Yes
  - ii.

1/19/1994
6/25/1998
6/26/1998
8/15/2003
8/20/2003
8/21/2003
8/1/2006
8/2/2006
7/22/2011

- i. See the following table for the 80% of the PJM revenues received by the Companies that were credited to customers in Rider DSE1, pursuant to the PUCO Entry on Rehearing dated July 17, 2013 in Case No. 12-2190-EL-POR, and continued pursuant to the PUCO Order dated November 21, 2017 in Case No. 16-743-EL-POR:

June 16 - May 17	June 17 - May 18	June 18 - May 19	June 19 - May 20	June 20 - May 21	June 21 - May 22	June 22 - May 23
\$ 75,251	\$ 1,969,546	\$ 1,365,170	\$ 3,557,180	\$ 2,066,337	\$ 3,091,897	\$ 5,324,066

Page 4  
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PUCO DR-006 Attachment 1

ESP IV Annual ELR and EDR(b) Credits

Source: SAP

Credit	June 16 - May 17	June 17 - May 18	June 18 - May 19	June 19 - May 20	June 20 - May 21	June 21 - May 22	June 22 - May 23
ELR	\$ (33,673,018)	\$ (32,236,629)	\$ (32,543,237)	\$ (28,644,560)	\$ (24,088,000)	\$ (28,102,595)	\$ (28,201,080)
EDR(b)	\$ (33,810,123)	\$ (32,490,151)	\$ (32,770,726)	\$ (34,487,779)	\$ (31,050,141)	\$ (32,472,820)	\$ (32,844,996)
Total	\$ (67,483,141)	\$ (64,726,780)	\$ (65,313,963)	\$ (63,132,340)	\$ (55,138,140)	\$ (60,575,415)	\$ (61,046,075)

- Please note that the Rider ELR tariff includes a "Minimum Bill" provision, which, if triggered, will lower the amount of Rider ELR credits. There is no such provision impacting the Rider EDR credits.

PUCO DR-006 Attachment 1

ESP IV Annual ELR and EDR(b) Credits

Source: SAP

Credit	June 16 - May 17	June 17 - May 18	June 18 - May 19	June 19 - May 20	June 20 - May 21	June 21 - May 22	June 22 - May 23
ELR	\$ (33,673,018)	\$ (32,236,629)	\$ (32,543,237)	\$ (28,644,560)	\$ (24,088,000)	\$ (28,102,595)	\$ (28,201,080)
EDR(b)	\$ (33,810,123)	\$ (32,490,151)	\$ (32,770,726)	\$ (34,487,779)	\$ (31,050,141)	\$ (32,472,820)	\$ (32,844,996)
Total	\$ (67,483,141)	\$ (64,726,780)	\$ (65,313,963)	\$ (63,132,340)	\$ (55,138,140)	\$ (60,575,415)	\$ (61,046,075)

- Please note that the Rider ELR tariff includes a "Minimum Bill" provision, which, if triggered, will lower the amount of Rider ELR credits. There is no such provision impacting the Rider EDR credits.

RESA Set 02  
Answer Prepared By: Lindsey Arch  
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO  
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

**ANSWERS TO INTERROGATORIES**

**RESA Set** For Rider AMI, identify the total annual revenue, by year back to 2009, collected  
**02- INT-008** from all customers through Rider AMI.

**Response:** Objection. This Request is overly broad and unduly burdensome in requesting  
“the total annual revenue, by year back to 2009, collected from all customers  
through Rider AMI.” This Request seeks information that is not relevant and  
not reasonably calculated to lead to the discovery of admissible evidence.  
Subject to and without waiving the foregoing objections, see RESA Set 02-INT-  
008-Attachment 1.

RESA CL  
8

RESA Set 2 INT-008 Attachment 1

CEI	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	723,022.35	644,722.22	1,247,141.09	1,415,978.53	1,875,588.15	1,853,425.48	1,932,198.56	1,760,200.07	2,377,934.58	12,576,953.65	19,763,688.18	24,831,034.48
COMMERCIAL	465,458.48	401,705.83	783,441.22	908,428.87	1,276,117.78	1,192,148.88	1,245,583.88	1,101,438.66	1,709,814.39	11,064,431.43	17,811,675.77	23,198,880.09
INDUSTRIAL	55,019.94	50,728.02	102,118.89	115,870.91	159,046.26	148,851.78	163,454.61	142,002.51	204,301.75	1,165,041.11	1,914,830.23	2,526,813.78
LIGHTING	31,689.17	124,862.84	(48,123.89)	61,401.87	82,281.36	80,766.90	82,217.74	76,442.23	104,581.86	584,474.58	948,942.22	1,295,853.89
TOTAL	\$ 1,275,188	\$ 1,222,017	\$ 2,088,575	\$ 2,501,478	\$ 3,483,032	\$ 3,275,183	\$ 3,423,433	\$ 3,080,083	\$ 4,388,832	\$ 25,390,901	\$ 40,457,134	\$ 51,853,832

OE	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	1,008,304.32	888,318.00	1,734,842.13	1,976,632.09	2,758,011.12	2,588,182.05	2,889,125.21	2,469,872.17	3,870,366.37	20,513,718.93	37,334,864.84	34,057,008.38
COMMERCIAL	638,014.30	551,351.28	1,083,989.28	1,255,972.03	1,774,186.20	1,681,328.09	1,744,020.07	1,551,860.48	2,047,895.40	9,238,327.18	16,605,386.20	15,757,558.83
INDUSTRIAL	88,130.82	88,104.19	170,177.14	188,790.77	280,078.47	238,507.59	255,857.71	227,417.40	340,708.32	1,932,487.18	3,548,528.36	3,415,113.82
LIGHTING	36,530.34	30,720.82	59,013.06	75,621.04	99,634.92	92,280.41	98,161.02	89,885.80	115,922.83	503,863.32	917,338.89	852,803.57
TOTAL	\$ 1,778,980	\$ 1,568,494	\$ 3,047,822	\$ 3,498,018	\$ 4,889,809	\$ 4,578,278	\$ 5,087,184	\$ 4,339,046	\$ 6,174,891	\$ 32,188,517	\$ 58,406,118	\$ 54,082,484

TE	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	298,763.38	265,381.61	512,938.14	581,949.10	811,739.83	781,798.35	788,827.38	727,112.37	1,024,069.89	7,891,135.78	9,880,181.85	8,324,358.23
COMMERCIAL	203,114.85	171,708.76	335,131.82	398,797.37	556,427.85	522,902.57	537,918.74	478,617.09	643,742.30	4,528,842.88	5,697,142.71	4,958,739.98
INDUSTRIAL	28,751.09	30,884.28	61,865.30	70,311.59	95,338.58	87,283.45	104,834.45	98,036.93	120,917.76	703,865.88	884,081.87	769,986.77
LIGHTING	12,505.84	10,830.64	20,471.80	24,995.50	32,535.90	31,817.69	32,442.18	28,544.44	48,508.06	487,813.89	449,511.59	484,436.59
TOTAL	\$ 544,135	\$ 478,403	\$ 930,407	\$ 1,074,054	\$ 1,495,042	\$ 1,403,813	\$ 1,464,823	\$ 1,330,311	\$ 1,835,238	\$ 13,591,459	\$ 18,910,878	\$ 14,537,520

TOTAL	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
AMI												
RESIDENTIAL	2,028,090.03	1,808,421.83	3,484,721.36	3,974,559.72	5,543,337.20	5,201,406.89	5,691,149.15	4,957,184.61	7,072,370.84	40,981,808.39	66,988,712.45	67,212,399.10
COMMERCIAL	1,308,585.43	1,124,783.95	2,202,582.33	2,581,198.27	3,805,731.83	3,378,379.35	3,527,502.67	3,131,916.23	4,401,452.09	24,831,601.49	40,114,204.88	43,916,188.70
INDUSTRIAL	183,901.85	169,514.47	334,159.33	375,773.27	514,481.29	474,652.82	523,946.77	465,458.84	665,925.83	3,801,394.13	6,347,420.46	6,711,914.18
LIGHTING												
TOTAL	\$ 3,518,577	\$ 3,102,700	\$ 6,031,443	\$ 6,911,529	\$ 9,863,530	\$ 9,052,439	\$ 9,742,599	\$ 8,554,558	\$ 12,139,749	\$ 68,814,804	\$ 113,480,338	\$ 117,840,502

RESA Set 2 INT-003 Attachment 1

CEI

DCR-DELIVERY CAPITAL RECOVERY	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	20,326,079.24	27,857,565.27	31,076,806.37	30,753,330.24	31,264,430.93	39,132,074.09	44,206,082.46	47,945,143.35	54,172,782.42	55,072,733.84	53,667,380.08
COMMERCIAL	33,935,749.67	48,743,169.91	54,531,551.67	54,118,760.05	55,416,809.42	69,198,206.04	73,857,491.24	84,330,150.69	89,212,013.26	94,035,754.72	92,226,301.97
INDUSTRIAL	4,284,951.56	5,810,908.59	6,272,013.31	5,737,357.26	5,810,127.83	7,629,764.32	8,181,033.44	8,904,001.51	9,346,918.33	9,565,559.27	9,817,933.52
TOTAL	\$ 58,546,780	\$ 82,411,644	\$ 91,880,371	\$ 90,609,448	\$ 92,491,368	\$ 115,960,044	\$ 126,244,607	\$ 141,179,298	\$ 152,731,714	\$ 158,674,048	\$ 155,711,616

OE

DCR-DELIVERY CAPITAL RECOVERY	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	26,940,827.31	39,397,980.73	35,969,036.90	43,014,391.13	48,038,706.12	56,457,479.44	65,362,445.79	64,886,390.24	75,761,702.92	69,185,855.24	78,762,058.54
COMMERCIAL	24,898,301.57	35,996,517.04	31,852,411.50	40,024,368.34	43,015,376.45	50,229,117.77	54,672,363.02	55,185,762.24	62,930,634.20	63,905,976.90	71,207,618.44
INDUSTRIAL	5,143,216.87	7,339,730.32	6,494,980.68	7,996,100.01	9,414,636.64	11,063,640.86	12,013,743.56	11,877,124.43	13,623,221.17	11,790,071.43	13,810,261.14
TOTAL	\$ 56,982,346	\$ 82,734,228	\$ 74,315,429	\$ 91,034,859	\$ 100,468,719	\$ 117,750,238	\$ 132,048,542	\$ 131,949,277	\$ 152,315,558	\$ 144,881,704	\$ 163,779,938

TE

DCR-DELIVERY CAPITAL RECOVERY	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	5,797,649.60	9,278,954.84	11,469,007.80	11,371,268.79	10,714,491.94	12,656,407.50	14,755,601.96	16,221,080.10	18,522,398.32	17,534,311.22	17,467,008.99
COMMERCIAL	6,315,590.19	9,767,292.15	12,215,745.11	12,242,626.73	11,323,702.88	14,130,872.00	15,594,589.05	17,490,645.55	19,208,619.33	20,231,748.91	18,986,575.97
INDUSTRIAL	973,886.91	1,439,808.34	1,829,004.09	1,819,854.81	1,682,823.20	2,180,559.29	2,556,547.39	2,790,197.72	2,859,884.50	2,373,011.05	2,594,863.44
TOTAL	\$ 13,087,127	\$ 20,486,055	\$ 25,513,757	\$ 25,433,750	\$ 23,721,018	\$ 28,967,839	\$ 32,906,738	\$ 36,501,923	\$ 40,590,902	\$ 40,139,071	\$ 39,048,448

TOTAL

DCR-DELIVERY CAPITAL RECOVERY	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
RESIDENTIAL	53,064,556.15	76,534,500.84	78,513,851.07	85,138,990.16	90,017,628.99	108,245,961.03	124,324,130.21	129,052,613.69	148,456,883.66	141,792,700.30	149,896,447.61
COMMERCIAL	65,149,641.43	94,506,979.10	98,599,708.28	106,385,755.12	109,755,888.75	133,558,195.81	144,124,433.31	157,006,558.48	171,351,266.79	178,173,480.53	182,420,496.38
INDUSTRIAL	10,402,055.34	14,590,447.25	14,595,998.08	15,553,312.08	16,907,587.67	20,873,964.47	22,751,324.39	23,571,323.66	25,830,024.00	23,728,641.75	26,223,058.10
TOTAL	\$ 128,616,253	\$ 185,631,927	\$ 191,709,557	\$ 207,078,057	\$ 216,681,105	\$ 262,678,121	\$ 291,199,888	\$ 309,630,496	\$ 345,638,174	\$ 343,694,823	\$ 358,540,002



**Answer Prepared By: Brandon**  
**As to Objections: Trevor**

**Case No. 23-0301-EL-SSO**

**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 Standard Service Offer Pursuant to R.C. § 4928.143 in the Form of an Electric Security Plan**

**ANSWERS TO INTERROGATORIES**

**RESA Set** For the ELR credits, identify the total annual credits, by year back to 2009,  
**02- INT-005** provided to customers.

**Response:** Objection. This Request is vague and ambiguous in its use of the term "ELR credits" and the phrase "total annual credits." Further, this Request is overly broad and unduly burdensome in requesting "the total annual credits, by year back to 2009, provided to customers." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see the table below for annual Rider ELR credits from 2009 – 2015. See PUCO DR-006 question 1a. for the annual Rider ELR credits from June 2016-2022.

2009	2010	2011	2012	2013	2014	2015	Jan – May 2016
\$7,526,492	\$9,337,646	\$22,943,155	\$31,383,774	\$28,582,931	\$30,989,006	\$29,281,990	\$11,264,179

\*According to the Companies' latest records, customer is an OEG member as of February, 2023

-----First Billed Jan 2017

<b>Delivery Year</b>	<b>MWs</b>
2018/19	126.8
2020/21	132.8
2021/22	128.6
2022/23	199.5

**OMAEG Ex.**

4

**RESA Set 02**

**Answer Prepared By: Brandon McMillen**

**As to Objections: Trevor Alexander**

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**RESA Set 02– INT-003** For the DCR, identify the total annual revenue, by year back to 2009, collected from customers through the DCR.

**Response:** Objection. This Request is overly broad and unduly burdensome in requesting “the total annual revenue, by year back to 2009, collected from customers through the DCR.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see RESA Set 02-INT-003 Attachment 1.

## Case No. 23-0301-EL-SSO

**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**

**ANSWERS TO INTERROGATORIES**

**OCC Set 07– INT-021** In reference to the direct testimony of Brandon McMillen, please provide the amount of investment placed in service pursuant to the Delivery Capital Recovery (DCR) Rider by year since 2012, the approval date of the DCR Rider. Also please indicate if the investment is now included in the distribution rates of the Companies.

**Response:** See the table below for the annual change in gross plant in-service for the Companies included in the calculation of Rider DCR each year since 2012. These annual changes include plant additions, retirements, adjustments, transfers, and the impact of changes implemented from prior Rider DCR audits. As stated in Brandon S. McMillen's direct testimony page 3, this gross plant in-service activity is incremental to the gross plant in-service balances included in the rate base from the Companies' last distribution rate case.

<b>Period</b>	<b>Plant In-Service \$ millions</b>
1/1/2012 - 12/31/2012	\$ 394.4
1/1/2013 - 12/31/2013	\$ 192.6
1/1/2014 - 11/30/2014	\$ 180.3
12/1/2014 - 11/30/2015	\$ 240.4
12/1/2015 - 11/30/2016	\$ 274.1
12/1/2016 - 11/30/2017	\$ 270.3
12/1/2017 - 11/30/2018	\$ 242.5
12/1/2018 - 11/30/2019	\$ 294.0
12/1/2019 - 11/30/2020	\$ 256.0
12/1/2020 - 11/30/2021	\$ 169.1
12/1/2021 - 11/30/2022	\$ 150.6

*le*

OCC Set 5

**Answer Prepared By: Brandon McMillen, Juliette Lawless, Dhara Patel  
As to Objections: Trevor Alexander**

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OCC Set 05** For each of the following Riders, how are the costs of the Rider allocated to the  
**- INT-024** various customers classes:

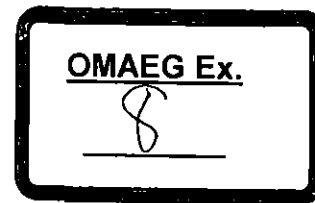
- (a) Delivery Capital Rider (DCR);
- (b) Advanced Metering Infrastructure Rider (AMI);
- (c) Storm Cost Recovery Rider (SCR);
- (d) Vegetation Management Cost Recovery Rider (VMC);
- (e) Non-Market Based Service Rider (NMB);
- (f) Economic Development Rider (EDR), provision (b); and
- (g) Energy Efficiency Cost Recovery Rider (EECR)?

**Response:**

- (a) Rider DCR revenue requirements are allocated to the Residential and Non-Residential rate classes by forecasted kWh and then allocated among each Non-Residential rate schedule (GS, GP and GSU) based on base distribution revenue. The current base distribution revenue allocation factors can be found in Schedule A to the Stipulation and Recommendation in Case No. 07-551-EL-AIR filed February 12, 2008.
- (b) Rider AMI revenue requirements, excluding operational savings, are allocated to all rate schedules except Rate GT based on base distribution revenue. The current base distribution revenue allocation factors can be found in Schedule A to the Stipulation and Recommendation in Case No. 07-551-EL-AIR filed February 12, 2008. Currently, deemed operational savings are all allocated to rate schedules based on the allocation factors in the Companies' Grid Mod I stipulation approved by the Commission in Case No. 16-481-EL-UNC, et al.
- (c) Rider SCR revenue requirements are proposed to be allocated to all rate schedules based on base distribution revenue. The current base distribution revenue allocation factors can be found in Schedule A to the Stipulation and Recommendation in Case No. 07-551-EL-AIR filed February 12, 2008.
- (d) Rider VMC revenue requirements are proposed to be allocated to all rate schedules based on base distribution revenue. The current base distribution

revenue allocation factors can be found in Schedule A to the Stipulation and Recommendation in Case No. 07-551-EL-AIR filed February 12, 2008.

- (e) Rider NMB is allocated to the Companies' rate schedules based on the four coincident system peaks from the prior year.
- (f) Objection. This request mischaracterizes EDR, provision (b). Subject to and without waiving the foregoing objection, Rider EDR, provision (b) provides credits to customers taking service under the Company's Economic Load Response Program Rider (ELR). Under the approved terms and conditions in ESP IV, these credits are recovered through the Rider EDR, provision (e). The Companies, in ESP V, propose to continue to recover these credits through Rider EDR, provision (e) under the same terms and conditions as approved in ESP IV. Rider EDR (e), provision 1 is allocated to Rate Schedules GS and GP to maintain current revenue allocations for this provision, and Rider EDR (e), provision 2 is allocated to all rate schedules based on base distribution revenue. The current base distribution revenue allocation factors can be found in Schedule A to the Stipulation and Recommendation in Case No. 07-551-EL-AIR filed February 12, 2008.
- (g) Costs for the proposed Rider EEC are not allocated. Rather, program costs are proposed to be tracked and recovered from residential and non-residential customers separately.



OCC Set 04

Answer Prepared By: Brandon S. McMillen

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OCC Set 04 –**  
**INT-003**

Please identify the amount of revenue reflected in FirstEnergy's five-year forecast which FirstEnergy would expect to collect through Rider AMI for each of the next five years.

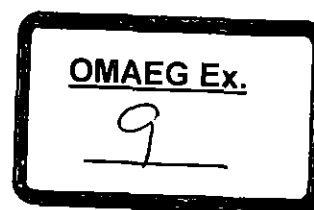
**Response:**

Rider AMI was most recently approved in the Companies' ESP IV and currently recovers costs associated with the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA ("SGMI") and costs associated with the Companies' first phase of their grid modernization business plan, approved in Case No. 16-481-EL-UNC, et al. ("Grid Mod I"). If any costs recovered in Rider AMI are authorized by the Commission to be included in a future base rate case, then those costs will be removed from Rider AMI and will be subject to the terms and conditions of the base rate case. For costs associated with SGMI and Grid Mod I, the following table shows the Companies' current five-year revenue forecast, estimated consistent with the current authorized terms and conditions of Rider AMI.

<b>Year</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
<b>\$M</b>	<b>\$99.5</b>	<b>\$91.7</b>	<b>\$86.3</b>	<b>\$86.3</b>	<b>\$82.6</b>

Additionally, the Companies are seeking approval of the second phase of their grid modernization business plan and associated cost recovery in Case No. 22-0704-EL-UNC ("Grid Mod II"). Please see Exhibit A of Companies' witness McMillen in the Grid Mod II case for forecasted revenue associated with proposed Grid Mod II.





OCC Set 04

Answer Prepared By: Brandon S. McMillen

As to Objections: Trevor Alexander

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

**OCC Set 04 –**  
**INT-018**

Referring to the Daymark Audit Report filed on November 14, 2022 in Case No. 16-481-EL-UNC, which of Daymark's recommendations will FirstEnergy implement for Rider AMI during the term of ESP V?

**Response:**

*Objection. The Companies object to this Request to the extent it calls for the disclosure of attorney work product and/or attorney-client privileged information. Also, the Request is overbroad and unduly burdensome in requesting that the Companies respond to the Daymark Audit Report in this proceeding, and this Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence.*

Subject to and without waiving the foregoing objections, the only recommendation in the audit report regarding implementation of Rider AMI was that the deemed operational savings required by the Commission-approved Grid Mod I Stipulation and Attachment D in Case No. 16-481-EL-UNC, et al. be applied for years 4-6. The Companies will comply with their obligations under the Stipulation, unless otherwise directed by the Commission.

Answer Prepared By: Brandon S. McMillen  
As to Objections: Trevor Alexander

**Case No. 23-0301-EL-SSO**

**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**

**ANSWERS TO INTERROGATORIES**

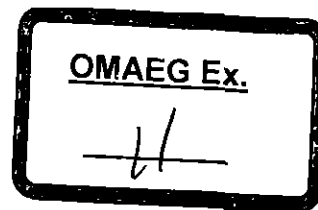
**OCC Set 04 –  
INT-012**

In light of the Daymark Audit Report filed on November 14, 2022 in Case No. 16-481-EL-UNC, is FirstEnergy willing to include in Rider AMI a fixed amount for a customer credit for operational benefits resulting from Grid Mod I and/or Grid Mod II?

**Response:**

Objection. This Request is vague and ambiguous in its use of the phrase “in light of the Daymark Audit Report ....” Objecting further, the Request improperly seeks or purports to require the Companies to provide documents and/or information that is publicly available or already in the possession, custody, or control of the requesting party, and thus equally available to the requesting party. The Request also calls for speculation.

Subject to and without waiving the forgoing objections, yes. The Companies’ approved Grid Mod I program in Case No. 16-481-EL-UNC, et al. includes terms and conditions for operational savings credits to customers through Rider AMI. Also, the Companies’ Grid Mod II proposal pending in Case No. 22-704-EL-UNC includes terms and conditions for operational savings credits to customers through Rider AMI, subject to PUCO approval. The terms and conditions regarding cost recovery for any subsequently approved grid modernization programs in Rider AMI will be subject to Commission review and approval in the respective cases authorizing those future grid modernization programs.



OCC Set 5

Answer Prepared By: Brandon McMillen  
As to Objections: Trevor Alexander

Case No. 23-0301-EL-SSO

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

**ANSWERS TO INTERROGATORIES**

**OCC Set 05** The following interrogatories relate to the Economic Load Response Rider  
**- INT-006** ("Rider ELR").

- (a) For the current calendar year and the past two calendar years, how many customers participate on the Economic Load Response Rider for each operating company (OE, CEI, & TE)?
- (b) What is the total curtailable load in kW for each operating company under Rider ELF for the current calendar year and the past two calendar years?
- (c) Are customers in the Rider ELR program also allowed to participate in the PJM Demand Response Program?
- (d) If Rider ELR customers are allowed to participate in the PJM Demand Response Program, are customers allowed to keep any credits received from PJM or are they required to reimburse FE?
- (e) For each of the past five years (201, 2019, 2020, 2021 and 2022) and to date in 2023, how many Emergency Curtailable Events occurred under Rider ELR?
- (f) What was the duration of each curtailable event?
- (g) How much load was actually curtailed for each Emergency Curtailable Event for OE, CEL and TE?

**Response:** (a) 16 OE customers; 4 CEI customers; and 4 TE customers.

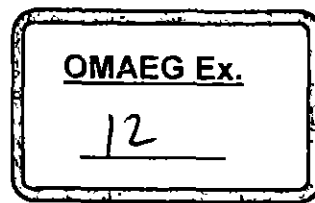
- (b) Objection. This request is vague and ambiguous in its use of the terms "Rider ELF" and "curtailable load." For purposes of this response the Companies assume "Rider ELF" means "Rider ELR" and that "curtailable load" is defined as provided in the Companies' Rider ELR tariffs. Subject to and without waiving the forgoing objections, see the table below for the sum of the total monthly curtailable loads in kW.

OPCO	2021	2022	2023 thru June
CEI	2,253,583	2,283,740	1,101,362
OE	2,019,121	2,097,305	1,024,888
TE	2,247,310	2,240,958	1,120,123

- (c) Objection. The request is vague and ambiguous in its use of the phrase “PJM Demand Response Program”. For purposes of this response, the Companies interpret this request to ask whether Rider ELR customers can participate with their demand response capabilities in the PJM capacity market. Subject to and without waiving the foregoing objections, the Rider ELR tariff provides that Rider ELR customers are not able to participate with their demand response capabilities in the PJM capacity market. . However, Rider ELR customers are able to participate in PJM programs related to the energy market.
- (d) Rider ELR customers that participate in PJM programs related to the energy market do not reimburse the Companies for credits they may receive from those other programs.
- (e) Objection. This Request is vague and ambiguous in its use of the term “201.” For purposes of this response, the Companies assume this Request seeks the number of Emergency Curtailable Events, including test events, from 2018-present. Subject to and without waiving the foregoing objections, see the table below.

Date	Start Time	End Time
May 14, 2019 (PJM Test)	2:00 PM	3:00 PM
May 11, 2021 (PJM Test)	2:00 PM	3:00 PM
May 10, 2022 (PJM Test)	2:00 PM	3:00 PM
December 24, 2022	10:10 AM	8:00 PM

- (f) See response to (e).
- (g) Objection. This Request is vague and ambiguous in its use of the terms “load was actually curtailed” and “CEL.” For purposes of this response, the Companies assume “CEL” means CEI. Subject to and without waiving the foregoing objections, for each event listed in (e), the Companies successfully curtailed to or below their PJM registered firm service level for all Rider ELR customers. See the table below for the expected load reduction for Rider ELR customers reported to PJM for each delivery year coinciding with the events listed in (e).



PUCO DR-006

Case No. 23-0301-EL-SSO

**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**

**RESPONSES TO THE PUBLIC UTILITIES COMMISSION OF OHIO'S  
DATA REQUESTS**

**PUCO  
DR-006**

1. Regarding the Economic Load Reduction (ELR) program:
  - a. For each year since the start of ESP IV, what is the total amount of credits paid to ELR participants (including credits under Rider EDR and Rider DSE)?
  - b. What is the total curtailable load for current ELR participants?
  - c. Identify all current ELR participants.
  - d. State the curtailable load for each current ELR participant.
  - e. For each year since the start of ESP IV, identify all ELR participants and the amount of annual credits received by each participant (under each of Rider EDR and Rider DSE).
  - f. For each current ELR participant, to the extent known by the Companies, state whether the participant is a member of Ohio Energy Group, Ohio Energy Leadership Council (formerly Industrial Energy Users-Ohio), Ohio Manufacturers' Association, or none of the above.
  - g. Since the beginning of ESP IV, how many times have the Companies called on ELR participants to interrupt each year?
  - h. Page 6 of the Testimony of Edward Stein states: "To date, the Companies have not called a load interruption event on their distribution system independent of PJM under the provisions of Rider ELR during the term of ESP IV."
    - i. Did the Companies call any load interruption events on their distribution system independent of PJM under the provisions of Rider ELR prior to the start of ESP IV?
    - ii. If so, how many times, under what circumstances, and on what dates?
  - i. Page 14 of the Testimony of Brandon McMillen states: "Over the term of ESP IV, average annual PJM revenue offsets for Rider ELR resources credited to customers were approximately \$2 million." Please provide the exact amount of credits for each year of ESP IV.

**Response:**

- a. See PUCO DR-006 Attachment 1.
- b. See PUCO DR-006 Attachment 2 Confidential.
- c. See PUCO DR-006 Attachment 2 Confidential.
- d. See PUCO DR-006 Attachment 2 Confidential.

- e. See PUCO DR-006 Attachment 2 Confidential for the credits ELR customers received through Riders ELR and EDR(b) for the period February 2019 through May 2023. The Companies are working on locating information prior to February 2019..
- f. The Companies' latest records of the membership of Rider ELR customers in the referenced customer groups are provided in PUCO DR-006 Attachment 2 Confidential. Membership may change without notification to the Companies.
- g. See the following table:

June 16 - May 17*	June 17 - May 18*	June 18 - May 19*	June 19 - May 20**	June 20 - May 21*	June 21 - May 22*	June 22 - May 23
1	1	1	0	1	1	1

\* PJM Test Event

\*\*For PJM year 2019/2020, the Companies received waivers of the Rider ELR testing requirements due to COVID-19 implications. See Case No. 20-1025-EL-WVR

- h.
  - i. Yes
  - ii.

1/19/1994
6/25/1998
6/26/1998
8/15/2003
8/20/2003
8/21/2003
8/1/2006
8/2/2006
7/22/2011

- i. See the following table for the 80% of the PJM revenues received by the Companies that were credited to customers in Rider DSE1, pursuant to the PUCO Entry on Rehearing dated July 17, 2013 in Case No. 12-2190-EL-POR, and continued pursuant to the PUCO Order dated November 21, 2017 in Case No. 16-743-EL-POR:

June 16 - May 17	June 17 - May 18	June 18 - May 19	June 19 - May 20	June 20 - May 21	June 21 - May 22	June 22 - May 23
\$ 75,251	\$ 1,969,546	\$ 1,365,170	\$ 3,557,180	\$ 2,066,337	\$ 3,091,897	\$ 5,324,066