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OELC Set 04

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 REQUEST FOR PRODUCTION OF DOCUMENTS**

**OELC Set 04– RPD-007** Please produce all studies, assessments, analyses, reports, or other documents relied on or referenced by FirstEnergy in developing its proposal to include a volumetric risk cap on load migration back to SSO service, as described on pages 6 through 9 of the testimony of Robert J. Lee filed in this Proceeding.

**Response:** The Companies have no responsive documents.

OELC #12

OELC Set 03

Answer Prepared By: Robert J. Lee

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 03– INT-004** Relating to FirstEnergy’s proposal to establish a volumetric risk cap on load migration back to SSO service, as described on pages 6 through 9 of the testimony of Robert J. Lee filed in this Proceeding, please provide the following information:

- a) Applying FirstEnergy’s proposal to the June 1, 2022 – May 31, 2023 planning year in order to illustrate the impact of the proposal on actual events, identify what the Peak Load Contribution (“PLC”) would have been per tranche as of June 1, 2022;
- b) Applying FirstEnergy’s proposal to the June 1, 2022 – May 31, 2023 planning year in order to illustrate the impact of the proposal on actual events, identify the daily PLC per tranche for each calendar day in that planning year;
- c) Applying FirstEnergy’s proposal to the June 1, 2022 – May 31, 2023 planning year in order to illustrate the impact of the proposal on actual events, identify each calendar day in that planning year on which the “benchmark plus 20 MW” volumetric risk cap would have been exceeded for SSO suppliers in that planning year;
- d) Applying FirstEnergy’s proposal to the June 1, 2022 – May 31, 2023 planning year in order to illustrate the impact of the proposal on actual events, for each of the calendar days identified in response to subpart (c) of this interrogatory identify:
  - i. the volume (in MWh) of electricity that FirstEnergy would have had to physically supply to its SSO customers on that day due to the volumetric risk cap;
  - ii. the real-time market prices FirstEnergy would have to pay for that volume of electricity; and
  - iii. how much per kWh FirstEnergy would have had to charge its SSO customers for that volume of electricity.

**Response:**

- a) Please see OELC Set 03-INT-004 Attachment 1.
- b) Please see OELC Set 03-INT-004 Attachment 1.
- c) Please see OELC Set 03-INT-004 Attachment 1.

d)

i. Please see OELC Set 03-INT-004 Attachment 1.

ii. Objection. Objection. This Request is overbroad and unduly burdensome in requesting “for each of the calendar days identified in response to subpart (c) of this interrogatory...the real-time market prices FirstEnergy would have to pay for that volume of electricity.” Subject to and without waiving the foregoing objection, please see OELC Set 03-INT-004 Attachment 1.

iii. Objection. This Request is overbroad and unduly burdensome in requesting “for each of the calendar days identified in response to subpart (c) of this interrogatory...how much per kWh FirstEnergy would have had to charge its SSO customers for that volume of electricity.” Subject to and without waiving the foregoing objection, please see OELC Set 03-INT-004 Attachment 1.

**This foregoing document was electronically filed with the Public Utilities  
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**11/30/2023 9:20:25 AM**

**in**

**Case No(s). 23-0301-EL-SSO**

Summary: Exhibit OELC Exhs 10, 11, 12 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc..