

**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**

**RESA Set** Admit that Company witness Miller is not an expert in energy market price  
**03– RFA-007** forecasts.

**Response:** Objection. This Request is vague and ambiguous in its use of the term “expert.” For purposes of this Request, the Companies interpret “expert” to refer to an expert in creating energy market price forecasts. Subject to and without waiving the foregoing objections, admit.

RESA Set 03

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

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**RESPONSE TO REQUESTS FOR ADMISSIONS**

**RESA Set** Admit that Company witness Miller is not an expert in capacity market price  
**03– RFA-008** forecasts.

**Response:** Objection. This Request is vague and ambiguous in its use of the term “expert.” For purposes of this Request, the Companies interpret “expert” to refer to an expert in creating capacity market price forecasts. Subject to and without waiving the foregoing objections, admit.

Ex 11

RESA Set 03

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

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**RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS**

**RESA Set**      Produce all analysis regarding the reliability benefits of the Company's  
**03 – RPD-**      proposed Demand Response for Residential program.  
**018**

**Response:**      Objection. This Request is vague and ambiguous in its use of the term  
                         "reliability benefits." Subject to and without waiving the foregoing objections,  
                         the Companies have not performed this analysis.

Ex 12

RESA Set 03

Case No. 23-0301-EL-SSO

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**RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS**

**RESA Set 03 – RPD-021**      Produce all analysis regarding the impact that the Demand Response for Residential Program will have on the reliability of individual distribution circuits.

**Response:**      Objection. This Request is vague and ambiguous in its use of the term “reliability of individual distribution circuits.” Subject to and without waiving the foregoing objections, the Companies have not performed this analysis.

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**in**

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Summary: Exhibit RESA 9, 10, 11, 12 electronically filed by Mr. Ken Spencer on  
behalf of Armstrong & Okey, Inc..