

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

OMAEG Set 02– INT-028 Referring to the explanation on page 11 of the Direct Testimony of Juliette Lawless regarding how NMB 2 charges will be calculated, why is the revenue neutral monthly per NSPL rate based on the total allocated revenue requirement for all C&I customers rather than only those participating in NMB 2?

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 objection, using the total allocated revenue requirement for setting the proposed NMB 2 rate better aligns with how non-market based services costs are assigned by PJM, where PJM uses one uniform rate for all load. See the Companies' response to PUCO DR-020. Also, this approach could help mitigate fluctuations in the NMB rates that may arise from customers moving from rate NMB 1 to NMB 2 between annual rate filing approvals.

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ANSWERS TO INTERROGATORIES

RESA Set 03– INT-039 Identify the Company’s total vegetation management expense, by year, back to 2009?

Response: Objection. This Request is overbroad and unduly burdensome in requesting “the Company’s total vegetation management expense, by year, back to 2009.” 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 03-INT-039 Attachment 1.

RESA Set 03-INT-039 Attachment 1

Ohio Vegetation Management Expenses Since 2009

	2009	2010	2011	2012	2013	2014	2015	2016
CEI CAP	\$14,434,159.18	\$14,880,322.84	\$15,077,158.50	\$12,363,967.36	\$14,399,002.57	\$13,826,139.90	\$10,329,015.37	\$8,015,041.13
CEI O&M	\$3,165,463.43	\$2,215,239.79	\$1,057,159.91	\$2,201,415.56	\$2,382,009.62	\$2,064,967.96	\$5,455,208.30	\$4,954,292.97
OE CAP	\$18,141,702.68	\$25,844,250.88	\$26,157,596.19	\$21,483,609.57	\$27,285,839.33	\$22,173,258.95	\$13,071,611.61	\$9,177,222.95
OE O&M	\$11,276,514.58	\$3,263,158.47	\$1,676,776.66	\$1,831,352.97	\$1,485,683.22	\$6,091,817.62	\$8,186,937.87	\$6,922,072.24
TE CAP	\$7,716,957.56	\$6,772,376.25	\$7,038,640.01	\$7,294,726.62	\$4,284,181.56	\$5,185,208.12	\$3,353,778.78	\$3,229,782.64
TE O&M	\$4,177,772.34	\$1,453,800.79	\$905,048.31	\$1,602,501.12	\$782,745.30	\$2,509,575.51	\$2,839,798.60	\$3,429,407.55
Total CAP	\$40,292,819.42	\$47,496,949.97	\$48,273,394.70	\$41,142,303.55	\$45,969,023.46	\$41,184,606.97	\$26,754,405.76	\$20,422,046.72
Total O&M	\$18,619,750.35	\$6,932,199.05	\$3,638,984.88	\$5,635,269.65	\$4,650,438.14	\$10,666,361.09	\$16,481,944.77	\$15,305,772.76
Total VM Spend	\$58,912,569.77	\$54,429,149.02	\$51,912,379.58	\$46,777,573.20	\$50,619,461.60	\$51,850,968.06	\$43,236,350.53	\$35,727,819.48

2017	2018	2019	2020	2021	2022
\$9,339,054.22	\$8,274,636.00	\$9,455,803.00	\$9,852,743.00	\$4,515,833.00	-\$45,641.00
\$5,767,778.60	\$6,495,101.00	\$5,728,576.00	\$6,294,017.00	\$12,504,609.00	\$21,741,207.00
\$12,048,640.63	\$7,419,617.00	\$8,478,775.00	\$7,109,129.00	\$3,073,179.00	-\$43,466.00
\$10,617,353.59	\$14,455,635.00	\$15,827,013.00	\$18,372,194.00	\$21,882,160.00	\$27,019,787.00
\$2,551,593.91	\$1,726,634.00	\$2,978,937.00	\$2,224,453.00	\$635,818.00	\$0.00
\$3,295,074.37	\$3,914,494.00	\$3,805,965.00	\$4,176,801.00	\$5,418,783.00	\$6,805,229.00
\$23,939,288.76	\$17,420,887.00	\$20,913,515.00	\$19,186,325.00	\$8,224,830.00	-\$89,107.00
\$19,680,206.56	\$24,865,230.00	\$25,361,554.00	\$28,843,012.00	\$39,805,552.00	\$55,566,223.00
\$43,619,495.32	\$42,286,117.00	\$46,275,069.00	\$48,029,337.00	\$48,030,382.00	\$55,477,116.00

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Summary: Exhibit OMAEG 15 and 16 electronically filed by Mr. Ken Spencer on
behalf of Armstrong & Okey, Inc..