

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Edison Company, The)	
Cleveland Electric Illuminating)	Case No. 23-301-EL-SSO
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)	

**OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY AND THE TOLEDO EDISON COMPANY’S MOTION FOR INTERIM
RELIEF TO CONDUCT SSO AUCTIONS
AND
REQUEST FOR EXPEDITED TREATMENT**

Pursuant to Rule 4901-1-12 of the Ohio Administrative Code, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the “Companies”) respectfully move the Commission for interim relief authorizing the Companies to conduct two full requirements standard service offer (“SSO”) auctions consistent with the competitive bidding process (“CBP”) approved in the Companies’ current electric security plan (“ESP IV”) ¹ to fulfill SSO commitments that begin on June 1, 2024.

Specifically, the Companies propose to conduct the first auction in late January/early February 2024 and the second auction between mid-March and early April 2024, at dates to be set subject to input from the Commission’s auction consultant, Bates White Economic Consulting. The Companies need to begin pre-auction activities, starting with bidder information sessions, at least 40 days in advance of each auction.

Therefore, to facilitate conducting the January/February 2024 auction and comply with

¹ See Case No. 14-1297-EL-SSO, Opinion and Order (March 31, 2016).

pre-auction notice requirements, the Companies request that this motion be considered on an expedited basis pursuant to Rule 4901-1-12(C). The Companies cannot certify that no parties have any objection to the request for expedited treatment.

The grounds for this Motion are more fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ N. Trevor Alexander

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Edison Company, The Cleveland)	
Electric Illuminating Company and)	Case No. 23-301-EL-SSO
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)	

MEMORANDUM IN SUPPORT

I. DISCUSSION

During the term of ESP IV (June 1, 2016 through May 31, 2024), the Companies have procured generation for SSO customers through competitive descending clock auctions in which potential suppliers bid to serve tranches of the SSO load.² After the Commission approves the results of each auction, winning bidders execute the Master Standard Service Offer Supply Agreement (“MSA”), which defines the winning bidders’ and the Companies’ rights and obligations concerning the provision of SSO supply. ESP IV and all current MSAs that have been or will be executed during the ESP IV term are scheduled to expire on May 31, 2024.

On April 5, 2023, the Companies filed an Application and supporting testimony to initiate the current proceeding and seek approval for an electric security plan that will commence upon the expiration of the Company’s current ESP IV (June 1, 2024) and continue through May 31, 2032 (“ESP V”).³ The Commission’s decision in ESP V will not be issued before the Companies must begin conducting auctions to ensure that their SSO obligation is met on and after June 1, 2024.

² See Case No. 14-1297-EL-SSO, Opinion and Order (March 31, 2016).

³ See Application at 1 (April 5, 2023).

Therefore, the Companies now seek interim relief to conduct two auctions prior to June 1, 2024: (1) an auction in late January/early February 2024, and (2) an auction between mid-March and early April 2024, with dates to be set subject to input from the Commission's auction consultant, Bates White Economic Consulting. Each auction would seek to procure 50% of SSO load (50 tranches) through a 12-month product for the period June 1, 2024 through May 31, 2025. The Companies propose to conduct these auctions pursuant to the CBP that was approved in the Companies' ESP IV⁴ -- a CBP process with which potential bidders are already familiar. The Companies propose to recover all costs of these auctions through their existing SSO cost recovery mechanisms, which would remain in effect until all costs are fully recovered or until extended by the Commission. The Companies do not seek to implement any of the CBP modifications that have been proposed in this docket.

Conducting two auctions for the delivery period June 1, 2024 to May 31, 2025 should help mitigate risk of procuring 100% of the Companies' SSO supply needs at a time of potentially unfavorable market conditions. The Companies propose to maximize the time between the two auctions, to the extent possible, to provide price-smoothing through staggering. In addition, the Companies' proposed timeframes will afford sufficient time for the Companies to subsequently conduct their Percentage of Income Payment Plan supply request(s) for proposal, such that they can timely submit their generation service rider tariff filings for Commission approval.⁵

While the capacity price through May 31, 2025 is already established, the capacity price for the 2025/2026 delivery year (*i.e.*, a portion of the delivery period of any product longer than 12 months) will not be available until after the start of the ESP V term.⁶ Procuring

⁴ See Case No. 14-1297-EL-SSO, Opinion and Order (March 31, 2016).

⁵ See Case No. 16-0541-EL-RDR, Finding and Order (5/25/2016) at ¶ 13 ("the Companies shall, for the remaining term of the ESP, file the PIPP and non-PIPP generation rates for Commission review no later than 30 days following the date of the last auction, and the final Rider GEN tariffs reflecting the updated PIPP and non-PIPP generation rates shall be approved effective June 1 of each year, contingent upon the Commission's review.").

⁶ On June 9, 2023, FERC approved PJM Interconnection, L.L.C.'s proposed revisions to the base residual auction ("BRA") schedules. The BRA for the 2025/2026 delivery year will now be held in June 2024.

only 12-month products will allow the Companies and bidders to avoid capacity price uncertainty.

To facilitate a January/February 2024 auction and provide sufficient notice, information, and application time to potential bidders in advance of the auction, the Companies request expedited treatment of this Motion. The Companies need to begin pre-auction activities, starting with bidder information sessions, at least 40 days in advance of each auction. Therefore, for the Companies and their auction manager to conduct an orderly and robust process leading up to the January/February auction, the Companies request that the Commission issue an order granting this motion as soon as practicable.

II. CONCLUSION

For the foregoing reasons, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company respectfully request that the Commission approve, on an expedited basis, their request for interim relief and authorize the Companies to conduct two auctions, one in late January/early February 2024 and the second auction between mid-March and early April 2024, at dates to be set subject to input from the Commission's auction consultant, consistent with the competitive bidding process approved in the Companies' ESP IV, each for 50 tranches of a 12-month product for the period June 1, 2024 through May 31, 2025.

Respectfully submitted,

/s/ N. Trevor Alexander

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing Motion for Interim Relief and Request for Expedited Treatment was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 13th day of December 2023. Service copies were sent to the following parties of record this 13th day of December 2023, via e-mail:

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Summary: Motion for Interim Relief to Conduct SSO Auctions and Request for Expedited Treatment electronically filed by Mr. N. Trevor Alexander on behalf of Ohio Edison Company and The Cleveland Illuminating Company and The Toledo Edison Company.