

**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)	Case No. 22-0704-EL-UNC
Edison Company for Approval of Phase)	
Two of Their Distribution Grid)	
Modernization Plan)	

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	Case No. 18-1647-EL-RDR
Edison Company for Review of Rider)	
AMI (2019))	

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	Case No. 19-1903-EL-RDR
Edison Company for Review of Rider)	
AMI (2020))	

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company, and The Toledo)	Case No. 20-1672-EL-RDR
Edison Company for Review of Rider)	
AMI (2021))	

MOTION TO CONSOLIDATE

Pursuant to Rule 4901-1-02(A)(6) and Rule 4901-1-12, Ohio Administrative Code, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”) move the Commission for an order consolidating the above-captioned matters into a single proceeding for purposes of considering the adoption and approval of the Stipulation and Recommendation (“Stipulation”) – signed by Citizens Utility Board of Ohio, Environmental Law & Policy Center, Interstate Gas Supply, LLC., The Kroger Co., Northeast Ohio Public Energy Council, Ohio Energy Group, Ohio Energy Leadership Council, Ohio Environmental Council, The Ohio Manufacturers' Association Energy Group,

Retail Energy Supply Association, Walmart Inc., and the Companies (collectively, the “Signatory Parties”) – that resolves all contested issues in the above-captioned proceedings.

As set forth more fully in the Memorandum in Support, consolidating these proceedings will avoid duplication, conserve the resources of the parties and the Commission, achieve additional process and administrative efficiencies, and recognize the common and interrelated nature of the cases at issue. As set forth in the Stipulation, the Signatory Parties agree that the above-captioned proceedings should be resolved jointly.

For the foregoing reasons and those set forth in the Memorandum in Support, the Companies respectfully request that the Commission grant this Motion and consolidate the above-captioned cases into a single proceeding.

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Respectfully submitted,

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MEMORANDUM IN SUPPORT

The Companies move the Commission for an order consolidating the above-captioned cases into a single proceeding to review and approve the Stipulation that resolves all outstanding issues in each of the above-captioned dockets. The common and interrelated issue in the above-captioned proceedings concerns the Stipulation, which resolves numerous contested issues in four cases, including phase two of the Companies’ distribution grid modernization plan (“Grid Mod II”) and the annual audits of the Companies’ Advanced Metering Infrastructure / Modern Grid Rider (“Rider AMI”) for the calendar years 2019 through 2021. By considering these cases

together, the Commission will avoid duplication, conserve the resources of the parties and the Commission, and achieve additional process and administrative efficiencies.

On April 12, 2024, Citizens Utility Board of Ohio, Environmental Law & Policy Center, Interstate Gas Supply, LLC., The Kroger Co., Northeast Ohio Public Energy Council, Ohio Energy Group, Ohio Energy Leadership Council, Ohio Environmental Council, The Ohio Manufacturers' Association Energy Group, Retail Energy Supply Association, Walmart Inc., and the Companies (collectively, the “Signatory Parties”) signed the Stipulation, which resolves all issues raised in the above-captioned proceedings. Specifically, the Stipulation provides for the Companies to further the development of a reliable and resilient distribution grid, allowing customers to make more informed choices about energy usage, facilitating access to customer data by authorized competitive retail electric service providers, and better enabling the Companies to make future electric distribution grid modernization investments. Given that the Stipulation will resolve all contested issues raised in the above-captioned proceedings, the Commission should consolidate the dockets. Consolidation will streamline and ensure an expeditious process to consider the terms of the Stipulation, by preventing the duplication of efforts across four individual dockets. Consequently, consolidation will conserve the resources of the Commission and the parties.

As set forth in the Stipulation, the Signatory Parties agree the above-captioned proceedings should be resolved jointly. Accordingly, the consolidation of the cases will benefit all parties (including the Commission) and prejudice none.

In conclusion, the Companies respectfully request that the Commission enter an order consolidating the above-captioned proceedings into a single proceeding for purposes of considering the Stipulation, which resolves all contested issues raised in each of the four individual dockets.

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CERTIFICATE OF SERVICE

I certify that the foregoing Motion to Consolidate and Memorandum in Support was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 15th day of April, 2024. The Commission's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

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**This foregoing document was electronically filed with the Public Utilities
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Summary: Motion to Consolidate electronically filed by Mr. N. Trevor Alexander on behalf of The Toledo Edison Company and The Cleveland Illuminating Company and Ohio Edison Company.