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May 13, 2020

Secretary
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Re: PUCO Case No. 20-1025-EL-WVR, *In the Matter of the Application of Ohio Edison Co., The Cleveland Elec. Illum. Co., and the Toledo Edison Co. for Waiver of Rider ELR Annual Testing Requirement and Request for Expedited Treatment*

Dear Secretary,

Industrial Energy Users-Ohio ("IEU-Ohio") submits this letter in support of Ohio Edison Company, The Cleveland Electric Illuminating Company, and the Toledo Edison Company's (collectively, "FirstEnergy") application in the above captioned matter. FirstEnergy has requested a waiver of the testing requirement associated with its Economic Load Response Program Rider ("Rider ELR") for the 2019/2020 delivery year.

Under Rider ELR, when PJM Interconnection, LLC ("PJM") does not call an Emergency Curtailment Event between June 1 and May 7 of a delivery year, FirstEnergy is required to perform a simultaneous interruption of service to all customers on Rider ELR by May 31 of that delivery year to meet its PJM test obligations for Load Management Demand Resources. No such event was called by May 7 of the 2019/2020 delivery year.

Requiring FirstEnergy to conduct the test under Rider ELR may cause additional hardship to customers that may already be facing curtailed operations and financial difficulties during the current state of emergency due to the ongoing COVID-19 crisis.

Moreover, Rider ELR customers have been participating under the program for years and have a proven track record of their interruptible capabilities in compliance with the ELR tariff requirements.

Furthermore, demand response has a proven compliance record with both declared events and testing. As reflected in the following chart, excerpted from PJM's most recent Load Management Performance Report for a full delivery year, over the last several delivery years

demand response resources have met or exceeded testing requirements, and have vastly exceeded committed levels during testing in recent years.¹

Delivery year	Event performance	Test performance
2009/10	No Events	118%
2010/11	100%	111%
2011/12	91%	107%
2012/13	104%	116%
2013/14	94%	129%
2014/15	No Events	144%
2015/16	No Events	134%
2016/17	No Events	153%
2017/18	No Events	163%
2018/19	No Events	146%

If this waiver is not granted by May 26, FirstEnergy will be required to conduct the test by May 31. IEU-Ohio supports FirstEnergy's request for a waiver of the test requirement for the current delivery year and urges the Commission to grant the request on an expedited basis.

Sincerely,

/s/ Matt Pritchard

Matthew R. Pritchard

Counsel for Industrial Energy Users-Ohio

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¹ Available at: <https://www.pjm.com/-/media/markets-ops/dsr/2018-2019-dsr-activity-report.ashx?la=en>.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/13/2020 1:55:59 PM

in

Case No(s). 20-1025-EL-WVR

Summary: Correspondence Industrial Energy Users-Ohio Letter in Support of FirstEnergy's Application electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio