

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Electric Power Supply Association, )  
Retail Energy Supply Association, )  
Dynegy Inc., Eastern Generation, LLC, )  
NRG Power Marketing LLC and GenOn )  
Energy Management, LLC, )**

**Complainants, )**

**v. )**

**AEP Generation Resources, Inc. and )  
Ohio Power Company, )**

**Respondents. )**

**Docket No. EL16-33-000**

**Electric Power Supply Association, )  
Retail Energy Supply Association, )  
Dynegy Inc., Eastern Generation, LLC, )  
NRG Power Marketing LLC and GenOn )  
Energy Management, LLC, )**

**Complainants, )**

**v. )**

**FirstEnergy Solutions Corporation, Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company and The Toledo )  
Edison Company, )**

**Respondents. )**

**Docket No. EL16-34-000**

**(Not consolidated)**

**LIMITED ANSWER**

Complainants in the above-captioned proceedings (“Complainants”) submit this limited answer to the motions of the Public Utilities Commission of Ohio (the “PUCO”) to

file comments out-of-time.<sup>1</sup> Complainants do not object to the Commission's granting the Motions and accepting the PUCO's out-of-time comments. The issues raised in the PUCO's comments have been fully addressed in Complainants' earlier pleadings, and Complainants do not, therefore, intend to file any response to those comments.<sup>2</sup> Complainants renew their earlier requests for issuance of an order granting the January 27, 2016 complaints<sup>3</sup> as soon as possible and, in particular, before the opening of the Base Residual Auction for the 2019/2020 Delivery Year on May 11, 2016.<sup>4</sup>

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<sup>1</sup> Motion to File Comments After Time Submitted on Behalf of the Public Utilities Commission of Ohio, Docket No. EL16-33-000 (filed Apr. 11, 2016) (the "EL16-33 Motion"); Motion to File Comments Submitted on Behalf of the Public Utilities Commission of Ohio, Docket No. EL16-34-000 (filed Apr. 11, 2016) (together with the EL16-33 Motion, the "Motions"). Under Rule 213(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission" or "FERC"), 18 C.F.R. § 385(a) (2015), Complainants are entitled to answer the Motions as a matter of right.

<sup>2</sup> The same is true of three other untimely pleadings filed in Docket No. EL16-34-000: Motion to Intervene Out of Time and Comments of the Utility Workers Union of America in Opposition to Complaint, Docket No. EL16-34-000 (filed Apr. 8, 2016); Motion for Leave to Answer and Limited Answer of the FirstEnergy Companies, Docket No. EL16-34-000 (filed Apr. 11, 2016); Motion to Intervene Out-Of-Time and Comments of the Laborers' International Union of North America Local No. 860 in Opposition to Complaint, Docket No. EL16-34-000 (filed Apr. 13, 2016).

<sup>3</sup> Complaint Requesting Fast Track Processing, Docket No. EL16-33-000 (filed Jan. 27, 2016); Complaint Requesting Fast Track Processing, Docket No. EL16-34-000 (filed Jan. 27, 2016).

<sup>4</sup> See PJM Interconnection, L.L.C., Auction Schedule, <http://www.pjm.com/~media/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.ashx>.

Respectfully submitted,

**ELECTRIC POWER SUPPLY ASSOCIATION    RETAIL ENERGY SUPPLY ASSOCIATION**

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On behalf of the **Electric Power  
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**EASTERN GENERATION, LLC**

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On behalf of **Eastern  
Generation, LLC**

Dated: April 13, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington DC, this 13<sup>th</sup> day of April, 2016.

/s/ Stephanie Lim  
Stephanie S. Lim