

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
FIRSTENERGY SOLUTIONS CORP., <i>et al.</i> , ¹)	Case No. 18-50757
Debtors.)	(Request for Joint Administration Pending)
)	
)	Hon. Judge Alan M. Koschik
)	

**NOTICE OF FILING CHAPTER 11 PETITIONS AND FIRST DAY MOTIONS AND
EXPEDITED HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE THAT, on March 31, 2018, the above-captioned debtors (the “Debtors”), filed with the United States Bankruptcy Court for the Northern District of Ohio, Eastern Division, their respective voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) commencing the above-captioned chapter 11 cases.

PLEASE TAKE FURTHER NOTICE THAT, the Debtors will present the motions set forth below (the “First Day Motions”) at a hearing on **Tuesday, April 3, 2018 at 9:00 a.m., (prevailing Eastern Time)** (“Hearing”), before the Honorable Alan M. Koschik, United States Bankruptcy Judge, at the United States Bankruptcy Court, 455 U.S. Courthouse, 2 South Main Street, Akron, Ohio 44308. **Details regarding telephonic participation will be provided by the Court and can be accessed on the docket in advance of the Hearing.**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: FE Aircraft Leasing Corp. (9245), case no. 18-50759; FirstEnergy Generation, LLC (0561), case no. 18-50762; FirstEnergy Generation Mansfield Unit 1 Corp. (5914), case no. 18-50763; FirstEnergy Nuclear Generation, LLC (6394), case no. 18-50760; FirstEnergy Nuclear Operating Company (1483), case no. 18-50761; FirstEnergy Solutions Corp. (0186); and Norton Energy Storage L.L.C. (6928), case no. 18-50764. The Debtors’ address is: 341 White Pond Dr., Akron, OH 44320.

Procedural Motions

- a. Motion of FirstEnergy Solutions Corp., et al., for Entry of an Order Directing Joint Administration of the Debtors' Chapter 11 Cases [Docket No. 3]
- b. Debtors' Motion for an Order Extending Time to File Schedules and Statements [Docket No. 9]
- c. Debtors' Motion for Entry of An Order (i) Authorizing the Debtors to (a) Prepare a Consolidated List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (b) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (ii) Approving the Form and Manner of Notifying Creditors of Commencement of these Chapter 11 Cases, and (iii) Granting Related Relief [Docket No. 13]
- d. Application of Debtors for Appointment of Prime Clerk LLC as Claims, Noticing and Solicitation Agent *nunc pro tunc* to the Petition Date [Docket No. 21]
- e. Debtors' Motion to Authorize: (i) the Establishment of Omnibus Hearing Dates; and (ii) Certain Case Management Procedures [Docket No. 19]

Operational Motions

- f. Motion of Debtors for Entry of Interim and Final Orders (a) Authorizing Debtors to (i) Continue Using Their Existing Cash Management System and (ii) Maintain Existing Business Accounts and Business Forms; (b) Authorizing Continued Intercompany Transactions; (c) Granting Postpetition Intercompany Claims Administrative Expense Priority; and (d) Granting Related Relief [Docket No. 10]
- g. Motion of Debtors for Entry of Interim and Final Orders Authorizing Continued Performance of Obligations Under Intercompany and Shared Services Agreements [Docket No. 12]
- h. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (a) Pay Certain Prepetition Compensation and Reimbursable Employee Expenses, (b) Pay and Honor Employee and Retiree Medical and Other Benefits, (c) Continue to Participate in FE Corp.'s Employee Compensation, Welfare, Retiree Benefit and Pension Plans and Programs and (d) Continue to Participate in FE Corp.'s Workers' Compensation Program and Modify the Automatic Stay with Respect Thereto [Docket No. 53]
- i. Debtors' Motion for Entry of an Order Authorizing the Debtors to (i) Maintain and Administer Customer Programs and to Perform Under Customer Agreements, (ii) Honor Obligations Related Thereto, and (iii) Establish Procedures for Notifying Customers in the Debtors' Chapter 11 Cases [Docket No. 18]

- j. Debtors' Motion for Entry of Interim and Final Orders Determining Adequate Assurance of Payment for Future Utility Services [Docket No. 11]
- k. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees [Docket No. 16]
- l. Debtors' Motion for Entry of an Order (i) Authorizing the Debtors to Continue their Prepetition Insurance Program and (ii) Authorizing the Debtors to Pay any Prepetition Premiums and Related Obligations [Docket No. 20]
- m. Debtors' Motion to Approve Continued Surety Bond Program [Docket No. 17]
- n. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (a) Grant Administrative Expense Priority to all Undisputed Obligations for Goods and Services Ordered Prepetition and Delivered Postpetition and Satisfy Such Obligations in the Ordinary Course of Business, and (b) Pay Prepetition Claims of Shippers, Warehousemen, and Materialmen [Docket No. 8]
- o. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Prepetition Critical Vendor Claims [Docket No. 7]
- p. Debtors' Motion for Entry of Interim and Final Orders Authorizing FirstEnergy Solutions Corp. to (a) Continue Performing Under Prepetition Hedging and Trading Arrangements, (b) Pledge Collateral and Honor Obligations Thereunder, and (c) Enter into and Perform Under Trading Continuation Agreements and New Postpetition Hedging and Trading Arrangements [Docket No. 14]

Copies of the First Day Motions can be obtained (a) through the United States Bankruptcy Court's PACER System; (b) at no charge from the following website <http://cases.primeclerk.com/FES>; or (c) by contacting Marc M. Merklin or Kate A. Bradley via (i) email at mmerkling@brouse.com or kbradley@brouse.com; (ii) telephone at 330.535.5711; or (iii) facsimile at 330.253.8601.

PLEASE TAKE FURTHER NOTICE THAT, if you do not want the Court to grant the relief requested in any of the First Day Motions, or if you want the Court to consider your views on any First Day Motions, then you or your attorney must attend the Hearing or participate telephonically.

Dated: April 1, 2018

Respectfully submitted,

/s/ Marc B. Merklin

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