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BOEHM, KURTZ & LOWRY

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July 12, 2007

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

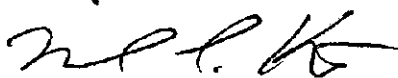
**In re: Case No 07-796-EL-ATA and 07-797-EL-AAM**

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of THE PETITION TO INTERVENE OF THE OHIO ENERGY GROUP filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Encl.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
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# **CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by regular mail, unless otherwise noted, this 12<sup>th</sup> day of July, 2007 to the following:

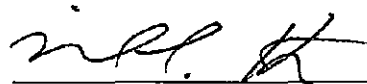
Cleveland Electric Illuminating Co  
Harvey Wagner VP And Controller  
76 S. Main Street  
Akron Oh 44308

Ohio Edison Company  
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Akron Oh 44308

Burk, James Attorney-At-Law  
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76 South Main Street  
Akron Oh 44308

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76 S. Main Street  
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Ohio Consumers Counsel  
Small, Jeffrey  
10 W. Broad Street Suite 1800  
Columbus Oh 43215-3485



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David F. Boehm, Esq.  
Michael L. Kurtz, Esq.

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

<b>In The Matter Of The Application Of Ohio Edison</b>	<b>:</b>	
<b>Company The Cleveland Electric Illuminating</b>	<b>:</b>	<b>Case Nos. 07-796-EL-ATA</b>
<b>Company And The Toledo Edison Company To</b>	<b>:</b>	<b>07-797-EL-AAM</b>
<b>Establish a Competitive Bidding Process</b>	<b>:</b>	

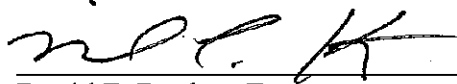
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**THE OHIO ENERGY GROUP'S  
MOTION FOR LEAVE TO INTERVENE**

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Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

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July 12, 2007

**COUNSEL FOR OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

<b>In The Matter Of The Application Of Ohio Edison</b>	<b>:</b>	
<b>Company The Cleveland Electric Illuminating</b>	<b>:</b>	<b>Case Nos. 07-796-EL-ATA</b>
<b>Company And The Toledo Edison Company To</b>	<b>:</b>	<b>07-797-EL-AAM</b>
<b>Establish a Competitive Bidding Process.</b>	<b>:</b>	

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**MEMORANDUM IN SUPPORT OF  
THE OHIO ENERGY GROUP'S  
MOTION TO INTERVENE**

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Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant The OEG Co. ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Air Products & Chemicals, Inc., AK Steel Corporation, BP Products North America, DaimlerChrysler Corp., Ford Motor Company, Mittal Steel, Inc., North Star BlueScope Steel, LLC, PPG Industries, Inc., Republic Engineered Products, Inc., WCI Steel, Inc., Worthington Industries, and V&M Star. These companies purchase electric distribution services from First Energy. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'D. F. Boehm', is written over a horizontal line.

David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

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**COUNSEL FOR THE OHIO ENERGY GROUP**

July 12, 2007