

6
LOCAL 270

UTILITY WORKERS UNION OF AMERICA

AFFILIATED WITH THE AFL-CIO

LIGHT-HEAT

POWER-WATER

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FILE

August 16, 2007

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

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In re: Case No. 07-0551-EL-AIR, Case No. 07-0552-EL-ATA,
Case No. 07-0553-EL-AAM, Case No. 07-0554-EL-UNC

Dear Sir/Madam:


Please find enclosed two original (2) copies of THE PETITION TO INTERVENE
BY THE UTILITY WORKERS UNION OF AMERICA, LOCAL NUMBER 270 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.

Sincerely,


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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 August 16, 2007 to the following:



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**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Application Of Ohio Edison)	
Company The Cleveland Electric Illuminating)	Case No. 07-0551-EL-AIR
Company And The Toledo Edison Company for)	Case No. 07-0552-EL-ATA
Authority Increase Rates For Distribution Service,)	Case No. 07-0553-EL-AAM
Modify Certain Accounting Practices and for Tariff)	Case No. 07-0554-EL-UNC
Approvals)	

**UTILITY WORKERS UNION OF AMERICA, LOCAL NUMBER 270
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Revised Code §4903.22.1 and Ohio Administrative Code §4901-1-11, the Utility Workers Union of America, Local Number 270 ("UWUA Local 270") moves for leave to intervene in this proceeding.

The Public Utility Commission of Ohio ("Commission") should grant UWUA Local 270 leave to intervene because UWUA Local 270 has a real and substantial interest in the proceeding.

Respectfully submitted,



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Modify Certain Accounting Practices and for Tariff) Case No. 07-0554-EL-UNC
Approvals**

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE OF THE
THE UTILITY WORKERS UNION OF AMERICA,
LOCAL NUMBER 270**

Pursuant to Ohio Revised Code §4903.22.1 and Ohio Administrative Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant leave to intervene of the Utility Workers Union of America, Local Number 270 ("UWUA Local 270") in this proceeding.

UWUA Local 270 has a real and substantial interest in these proceedings. Local 270 is the collective bargaining representatives that represent over 1000 employees of the Cleveland Electric Illuminating Company.

The members of UWUA Local 270 perform a wide variety of tasks including the operation, maintenance and replacement of transmission and distribution related equipment and also provides these services to customers. UWUA Local 270 and its membership have a strong interest in ensuring that the proceedings initiated by FirstEnergy before the Commission do not adversely affect the membership of Local 270, do not interfere with the proper and safe performance of their job duties and do not result

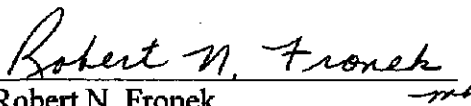
in unfair or inappropriate charges being passed on to the consumer. The interests of UWUA Local 270 members may be directly affected by the outcome of this proceeding.

UWUA Local 270 intends to play a constructive role in these proceedings and this intervention will not unduly delay these proceedings. In fact, Local 270 submits that intervention granted to it will enhance these proceedings and ensure that the proceedings are fair and equitable to its membership, other employees of FirstEnergy and to the consuming public.

UWUA Local 270 further submits that no other party to these proceedings can adequately represent the interests of UWUA Local 270 and its membership.

Accordingly, UWUA Local 270 respectfully submits that the Commission should grant its Motion to Intervene.

Respectfully submitted,


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