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**BEFORE
THE OHIO POWER SITING BOARD**

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In the Matter of the Application of)
American Transmission Systems, Incorporated)
and The Cleveland Electric Illuminating)
Company for a Certificate of Environmental)
Compatibility and Public Need for the)
Geauga County 138-kV Transmission Line)
Supply Project.)

Case No. 07-0171-EL-BTX

**INDUSTRIAL ENERGY USERS-OHIO'S
MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT**

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June 23, 2008

Attorneys for Industrial Energy Users-Ohio

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**INDUSTRIAL ENERGY USERS-OHIO'S
MOTION TO INTERVENE**

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Ohio Power Siting Board ("Board") pursuant to Section 4906.08(A)(3), Revised Code, and Rule 4906-7-04, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted, by the Board specifically, by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

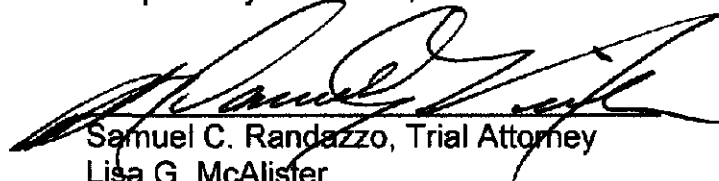
On September 28, 2007, and as amended on January 2, 2008, American Transmission Systems, Incorporated ("ATSI"), and The Cleveland Electric Illuminating Company ("CEI") (hereinafter referred to collectively as "the Companies") filed an application for a certificate of environmental compatibility and public need to construct a 138-kV transmission line in Geauga County ("Gauga County Project"). The Gauga County Project involves the construction of a looped extension of an existing 138-kV electric transmission line to supply a new 138-kV to a 36-kV distribution substation located along Mayfield Road in the Huntsburg Township area of Geauga County.¹

¹ Case No. 07-171-EL-BTX, Entry at 1 (March 3, 2008).

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest.

IEU-Ohio believes that its participation in this proceeding will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding. The interest of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene in this proceeding with the full powers and rights granted, by the Board specifically, by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Samuel C. Randazzo", is written over a horizontal line.

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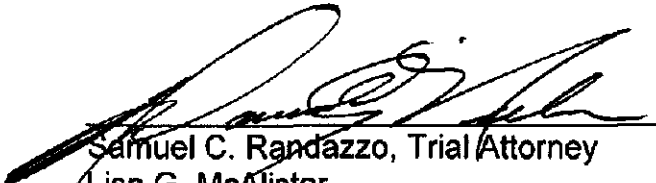
MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of electric and related services from CEI, which is a public utility subject to the jurisdiction of the Public Utilities Commission of Ohio ("Commission"). IEU-Ohio's members also purchase substantial quantities of electricity and related services from the other investor-owned utilities in Ohio that are interconnected with the CEI and its affiliates.

IEU-Ohio functions, on behalf of its members, to address matters that affect price, reliability and availability of energy required to operate members' facilities in Ohio. To this end, IEU-Ohio has worked and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the state policy contained in Section 4928.02, Revised Code. As part of this effort, IEU-Ohio has been an active participant in state and federal regulatory proceedings concerning Ohio's electric utilities.

Because this proceeding involves the construction of a transmission line that may impact the price and reliability of service that CEI and its affiliates may provide to IEU-Ohio members, IEU-Ohio has a direct and substantial interest in the outcome of this and any related proceedings. As such, IEU-Ohio hereby requests that the Board grant its intervention with the full powers and rights granted, by the Board specifically, by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

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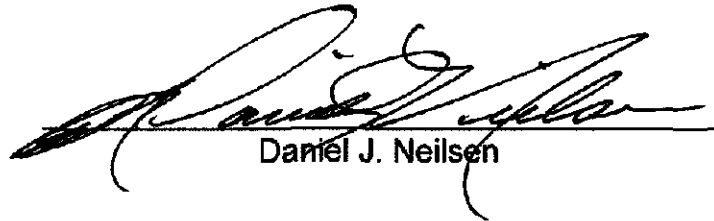
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Industrial Energy Users-Ohio's Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 23rd day of June 2007, via electronic transmission, hand-delivery, or ordinary U.S. mail, postage prepaid.



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