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BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255  
TELECOPIER (513) 421-2764

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Via Overnight Mail

August 1, 2008

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

In re: Case Nos. 08-935-EL-SSO and 08-936-EL-SSO

Dear Sir/Madam:

Please find enclosed an original and ten (10) copies of the OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE 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.  
Cc: Certificate of Service

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**CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by ordinary mail, unless otherwise noted, this 1<sup>st</sup> day of August, 2008 to the following:

CLEVELAND ELECTRIC ILLUMINATING CO  
HARVEY L. WAGNER  
76 S. MAIN STREET  
AKRON OH 44308

KORKOSZ, ARTHUR  
FIRST ENERGY, SENIOR ATTORNEY  
76 SOUTH MAIN STREET LEGAL DEPT., 18TH FL.  
AKRON OH 44308-1890


OHIO EDISON COMPANY  
HARVEY WAGNER, VP AND CON  
76 S. MAIN STREET  
AKRON OH 44308

BURK, JAMES ATTORNEY-AT-LAW  
FIRSTENERGY SERVICE COMPANY  
76 SOUTH MAIN STREET  
AKRON OH 44308

TOLEDO EDISON COMPANY  
HARVEY L. WAGNER  
76 S. MAIN STREET  
AKRON OH 44308

HAYDEN, MARK A MR.  
FIRSTENERGY CORP  
76 SOUTH MAIN STREET  
AKRON OHIO 44308

MILLER, EBONY L. ATTORNEY-AT-LAW  
FIRSTENERGY CORP.  
76 SOUTH MAIN ST.  
AKRON OH 44308



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. 08-935-EL-SS0</b>
<b>Company And The Toledo Edison Company For</b>	<b>:</b>	<b>08-936-EL-SSO</b>
<b>Authority To Establish A Standard Service Offer</b>	<b>:</b>	
<b>Pursuant To R.C. §4928.143 In The Form Of An</b>		
<b>Electric Security Plan</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,



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David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)

[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

August 1, 2008

**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. 08-935-EL-SS0</b>
<b>Company And The Toledo Edison Company For</b>	<b>:</b>	<b>. 08-936-EL-SSO</b>
<b>Authority To Establish A Standard Service Offer</b>	<b>:</b>	
<b>Pursuant To R.C. §4928.143 In The Form Of An</b>	<b>:</b>	
<b>Electric Security Plan</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, Alcoa Inc., ArcelorMittal, BP-Huskey Refining, Inc., Brush Wellman Inc., Chrysler LLC., Ford Motor Company, North Star BlueScope Steel, LLC, PPG Industries, Inc., Republic Engineered Products, Inc., Sunoco Toledo Refinery, WCI Steel, Inc., Worthington Industries, and Linde, Inc. 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,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

E-Mail: [dboehm@BKLawfirm.com](mailto:dboehm@BKLawfirm.com)

[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

**COUNSEL FOR THE OHIO ENERGY GROUP**

August 1, 2008