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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2008 AUG 18 AM 9:56

In the Matter of the Application of Ohio Edison )  
Company, The Cleveland Electric Illuminating )  
Company, and The Toledo Edison Company for )  
Authority to Establish a Standard Service Offer )  
Pursuant to R.C. §4928.143 in the Form of an, )  
Electric Security Plan )

PUCO

Case No. 08-935-EL-SSO

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company and The Toledo Edison )  
Company for Approval of a Market Rate Offer )  
To Conduct a Competitive Bidding Process )  
For Standard Service Offer Electric Generation )  
Supply, Accounting Modifications Associated )  
With Reconciliation Mechanism, and Tariffs )  
For Generation Service )

Case No. 08-936-EL-SSO

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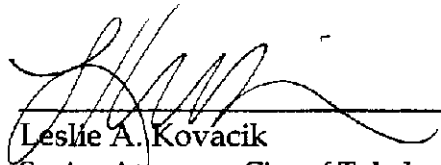
MOTION TO INTERVENE  
ON BEHALF OF THE COMMUNITIES IN THE  
NORTHWEST OHIO AGGREGATION COALITION

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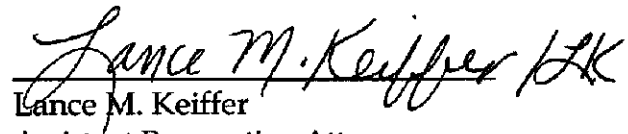
The Cities of Maumee, Northwood, Oregon, Sylvania, Toledo, the Village of Holland, Lake Township and the Board of County Commissioners, Lucas County, Ohio, on behalf of the Unincorporated Townships of Lucas County, known collectively as the Northwest Ohio Aggregation Coalition (hereinafter "NOAC"), respectfully move the Public Utilities Commission, pursuant to Section 4903.221 of the Ohio Revised Code and Section 4901-1-11 of the Ohio Administrative Code, to grant intervention in these proceedings for the reasons set forth in the following Memorandum in Support.

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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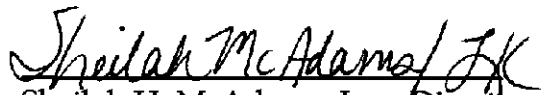
Respectfully submitted,



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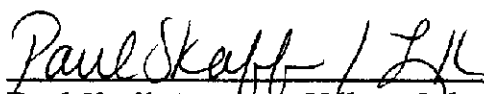
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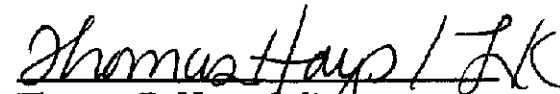
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## MEMORANDUM IN SUPPORT

On July 31, 2008 the Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company (collectively "FirstEnergy") filed its Applications to establish an Electric Security Plan and a Market Rate Offer. The outcome of these Applications will have a real and substantial impact on NOAC and no other party is uniquely positioned to represent NOAC's interests in this proceeding.

The nature and extent of NOAC's interest lies in the fact that it operates a commercial aggregation program serving 17,000 businesses that would otherwise have the highest electric standard service rates in the state.<sup>1</sup> Additionally, it used to serve about 120,000 residential homes via governmental aggregation and it hopes to again offer an electric program to residential customers in northwest Ohio. The content of these proceedings directly impact NOAC's ability to do so.

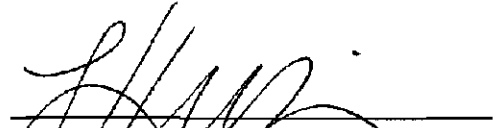
NOAC intends to participate fully in these proceedings with a focus on the impact to government aggregators and protecting the interests of its commercial customers and accounts. NOAC anticipates it will retain one or more expert witnesses to further relevant legal positions on behalf of aggregations, residential users and commercial customers.

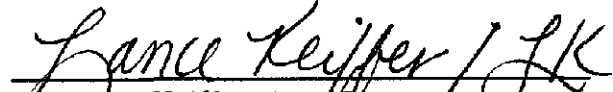
NOAC's participation and the contributions of its expert(s) would contribute to a proper and just resolution of these issues involved without imposing any unnecessary delay or prejudice against another party. For these reasons, NOAC requests that its Motion to Intervene be granted.


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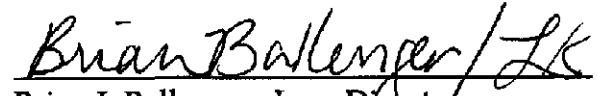
<sup>1</sup> <http://www.puco.ohio.gov/emplibrary/files/util/UtilityRateSurvey/July08.pdf>

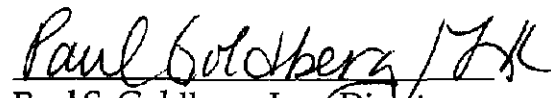
Respectfully submitted,

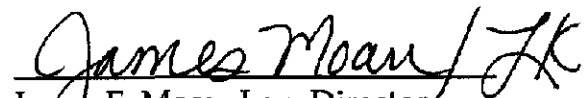
  
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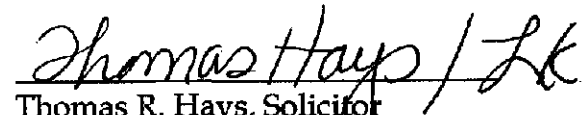
  
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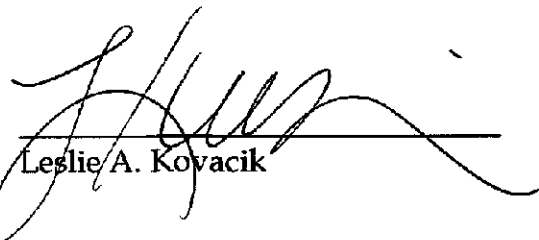
  
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#### CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Intervene with Memorandum in Support was placed in the U.S. Mail this 19th day of August, 2008, addressed to the following parties:

  
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