

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

6
RECEIVED-DOCKETING DIV
2008 SEP -4 PM 4:20
PUCO

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 Section 4928.143, Revised Code in the)
Form of an Electric Security Plan.)

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

**JOINT MOTION TO INTERVENE
OF
THE AMERICAN WIND ENERGY ASSOCIATION, WIND ON THE WIRES AND
OHIO ADVANCED ENERGY**

The American Wind Energy Association ("AWEA"), Wind on the Wires ("WOW") and Ohio Advanced Energy ("OAE") jointly move, pursuant to Ohio Revised Code ("R.C.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, to intervene in the above-captioned proceedings. As set forth in the Memorandum in Support, AWEA, WOW and OAE submits that they have a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without the participation of AWEA, WOW and OAE may impair or impede their ability to protect that interest, and that their participation in these proceedings will contribute to a just result. AWEA, WOW and OAE further submit that no existing party represents their interest in these proceedings and that granting their motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

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.
Technician ADH Date Processed 9/4/08

MEMORANDUM IN SUPPORT

AWEA is a national trade association representing wind power project developers, equipment suppliers, services providers, parts manufacturers, utilities, researchers, and others involved in the wind industry. AWEA currently serves more than 1,500 members across the country. WOW serves as a key regional partner of the AWEA. WOW is comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry. WOW's simple mission is to provide wind energy with fair access to the electric transmission system delivering power to market.

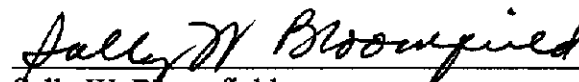
OAE is the premier Ohio-based business trade association advocating on behalf of advanced and renewable technology industries. Comprised of 22 companies and organizations working in the areas of solar power, wind power, and other advanced energy technologies, OAE advocated extensively in the General Assembly for the alternative energy portfolio standard in S.B. 221 and is implementing a coherent economic growth strategy for Ohio centered on advanced and renewable energy. The members of AWEA, WOW and OAE are potential suppliers of alternative energy sources to Ohio electric utilities, and as such they have a real and substantial interest in these applications as it pertains to the Applicant's proposals to secure alternative energy resources as well as an interest in other issues in these proceedings.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, AWEA, WOW and OAE are real parties in interest herein, whose interest are not now represented, who can make a contribution to these proceedings and who will not unduly delay these proceedings or prejudice any existing party. AWEA, WOW and OAE submit that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns

raised in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, the American Wind Energy Association, Wind on the Wires and Ohio Advanced Energy respectfully request that their motion to intervene in the above-captioned proceedings be granted.

Respectfully submitted on behalf of
AMERICAN WIND ENERGY ASSOCIATION
WIND ON THE WIRES
OHIO ADVANCED ENERGY



Sally W. Bloomfield
Terrence O'Donnell
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227; 2368; 227-2345
Facsimile: (614) 227-2390
E-mail: sbloomfield@bricker.com
todonnell@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 4th day of September 2008 via regular mail.


Sally W. Bloomfield

James Burk
Mark Hayden
FirstEnergy
76 South Main Street
Akron, OH 43308-1890
burkj@firstenergycorp.com
haydenm@firstenergycorp.com

Mark A. Whitt
Andrew J. Campbell
Jones Day
325 John H. McConnell Blvd., Suite 600
Columbus, OH 43215-2673
mawhitt@jonesday.com
ajcampbell@jonesday.com

Samuel C. Randazzo
Lisa G. McAlister
Daniel J. Neilsen
Joseph Clark
McNees, Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com
lmcalister@mwncmh.com
dneilsen@mwncmh.com
jclark@mwncmh.com

Colleen L. Mooney
David Rinebolt
Ohio Partners for Affordable Energy
231 W. Lima Street
Findlay, OH 45389-1793
Cmooney2@columbus.rr.com
drinebolt@aol.com

Jeffrey L. Small
Jacqueline Roberts
Richard C. Reese
Gregory J. Poulos
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
small@occ.state.oh.us
reese@occ.state.oh.us
poulos@occ.state.oh.us
roberts@occ.state.oh.us

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
dboehm@bklawfirm.com
mikurtz@bklawfirm.com

Barth Royer
Bell & Royer
33 South Grant Avenue
Columbus, OH 43215-3927
barthroyer@aol.com

Gary A. Jeffries
Senior Counsel
Dominion Resources Services, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
gary.a.jeffries@dom.com

David L. Fein
Cynthia A. Fonner
Constellation Energy Group, Inc.
550 West Washington Blvd., Suite 300
Chicago, IL 60661
David.fein@constellation.com
cynthia.a.fonner@constellation.com

John W. Bentine
Mark S. Yurick
Chester, Wilcox & Saxbe
65 E. State Street, Suite 1000
Columbus, OH 43215
myurick@cwslaw.com
jbentine@swslaw.com

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
PO Box 1008
Columbus, OH 43216-1008
mhpetricoff@vssp.com
smhoward@vssp.com

Henry Eckart
50 West Broad Street, Suite 2117
Columbus, OH 43215-3301
henryeckhart@aol.com

Craig G. Goodman
President
National Energy Marketers Association
3333 K Street, N.W., Suite 110
Washington, D.C. 20007
cgoodman@energymarketers.com

Langdon D. Bell
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927
lbell@aol.com

Richard L. Sites
Ohio Hospital Association
155 East Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org

Nolan Moser
Trent A. Dougherty
Air & Energy Program Manager
The Ohio Environmental Council
1207 Grandview Avenue, Suite 201
Columbus, OH 43212-3449
nolan@theoec.org
trent@theoec.org

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
8th Floor West Tower
Washington, D.C. 20007
gas@bbrslaw.com
mkl@bbrslaw.com

Leslie A. Kovacik
Senior Attorney, City of Toledo
420 Madison Ave., Suite 100
Toledo, Ohio 43604-1219
lesHe.kovacik@toledo.oh.gov

Sheilah M. McAdams
Marsh & McAdams
204 West Wayne Street
Maumee, Ohio 43537
sheilahmca@aol.com

Paul S. Goldberg, Law Director
Phillip D. Wurster, Asst. Law Dir.
5330 Seaman Road
Oregon, Ohio 43616
pgoldberg@ci.oregon.oh.us

Paul Skaff, Assistant Village Solicitor
Leatherman, Witzler
353 Elm Street
Perrysburg, Ohio 43551
paulskaff@justice.com

Lance M. Keiffer
Assistant Prosecuting Attorney
711 Adams Street, 2nd Floor
Toledo, Ohio 43624-1680
lkeiffer@co.lucas.oh.us

Brian J. Ballenger
Ballenger & Moore
3401 Woodville Rd., Suite C
Toledo, Ohio 43619
ballengerlawbjb@sbcglobal.net

James E. Moan, Law Director
4930 Holland-Sylvania Road
Sylvania, Ohio 43560
jimmohan@hotmail.com

Thomas R. Hays,
3315 Centennial Road, Suite A-2
Sylvania, Ohio 43560
hayslaw@buckeye-express.com

Joseph P. Meissner
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, OH 44113
jpmessn@lasclev.org

Sean W. Vollman
David A. Muntean
Assistant Law Directors
161 S. High Street, Suite 202
Akron, OH 44308
vollmse@ci.akron.oh.us
menteda@ci.akron.oh.us

Larry Gearhardt
Chief Legal Counsel
Ohio Farm Bureau Federation
280 North High Street
PO Box 182383
Columbus, OH 43218-2383
lgearhardt@ofbf.org

Gregory H. Dunn
Christopher L. Miller
Andre T. Porter
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, OH 43215
gdunn@szd.com
cmiller@szd.com
aporter@szd.com

F. Mitch Dutton
Senior Attorney
FPL Energy Power Marketing, Inc.
700 Universe Boulevard
CTR/JB
Juno Beach, FL 33408
mitch.dutton@fpl.com