

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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December 17, 2008

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

In re: Case Nos. 08-1299-EL-UNC

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of the MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP fax-filed today 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 17th day of December, 2008 to the following:

OHIO CONSUMERS' COUNSEL
10 W. BROAD STREET SUITE 1800
COLUMBUS OH 43215-3485

*REESE, RICHARD ATTORNEY AT LAW
10 WEST BROAD STREET SUITE 1800
COLUMBUS OH 43215-3485

POULOS, GREGORY J ATTORNEY
OHIO CONSUMERS' COUNSEL
10 WEST BROAD ST. SUITE 1800
COLUMBUS OH 43215-3485

KEIFFER, LANCE
ASSISTANT PROSECUTING ATTORNEY
711 ADAMS STREET 2ND FLOOR
TOLEDO OH 43624-1680

YOST, MELISSA R
OHIO CONSUMERS COUNSEL
10 WEST BROAD STREET, SUITE 1800
COLUMBUS OHIO 43215-3485

FINNAM, THEODORE O
421 PUBLIC SQUARE
GREENVILLE OH 45331

AARP
RON BRIDGES
17 SOUTH HIGH STREET
SUITE 800
COLUMBUS OH 43215

APPALACHIAN PEOPLE'S ACTION, COALITION
MICHAEL R. SMALZ
OHIO STATE LEGAL SERVICE ASSOC.
555 BUTTLES AVENUE
COLUMBUS OH 43215

CITIZENS FOR FAIR UTILITY RATES
TIM WALTERS
C/O THE MAY DUGEN CENTE
4115 BRIDGE AVENUE
CLEVELAND OH 44113

NORTHWEST OHIO AGGREGATION COALITION
ONE GOVERNMENT CENTER, SUITE 2250
TOLEDO OH 43604

MEISSNER, JOSEPH
DIRECTOR OF URBAN DEVELOPMENT
ATTORNEY AT LAW
1223 WEST SIXTH STREET
CLEVELAND OH 44113

EMPOWERMENT CENTER OF GREATER
3030 EUCLID AVENUE
UNIT 100
CLEVELAND OH 44115

EDGEMONT NEIGHBORHOOD COALITION

ELLIS JACOBS
333 WEST FIRST STREET SUITE 500B
DAYTON OH 45402

CLEVELAND HOUSING NETWORK
2999 PAYNE AVENUE
CLEVELAND OH 44114

LEGAL AID SOCIETY OF CLEVELAND
JOSEPH MEISSNER
URBAN DEVELOP OFF, 1223 W. SIXTH ST
CLEVELAND OH 44113

OHIO FARM BUREAU FEDERATION, INC.
DALE ARNOLD
DIRECTOR ENERGY SERVICES P.O. BOX 182383
COLUMBUS OH 43218

NEIGHBORHOOD ENVIRONMENTAL COALITION

KOVACIK, LESLIE

REV. MIKE FRANK, CO-CHAIR
5920 ENGLE AVE.
CLEVELAND OH 44127

DEPARTMENT OF PUBLIC UTILITIES
420 MADISON AVENUE SUITE 100
TOLEDO OH 43604

A handwritten signature in black ink, appearing to read "D. F. Boehm", written over a horizontal line.

David F. Boehm, Esq.
Michael L. Kurtz, Esq.

BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO

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In The Matter Of Commission Investigation Into The : Case No. 08-1299-EL-UNC
Reliability Of The Electric Distribution Service Provided :
By Ohio's Investor-Owned Electric Utilities :

THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE

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,



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

mkurtz@BKLawfirm.com

December 17, 2008

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of Commission Investigation Into The	:	Case No. 08-1299-EL-UNC
Reliability Of The Electric Distribution Service Provided	:	
By Ohio's Investor-Owned Electric Utilities	:	

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S MOTION TO INTERVENE**


Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio should grant OEG leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial 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, Aleris International, Inc., Alcoa Inc., ArcelorMittal USA, BP-Husky Refining, LLC, Brush Wellman, Inc., Charter Steel, Chrysler LLC, E.I. DuPont de Nemours & Company, Ford Motor Company, GE Aviation, Griffin Wheel, Johns Manville, Linde, Inc., North Star BlueScope Steel, LLC, PPG Industries, Republic Engineered Products, Inc., Severstal Warren, Inc., Severstal Wheeling, Sunoco, Inc. (R&M), The Procter & Gamble Co. and Worthington Industries, Inc. These companies purchase electric power services from all of the utilities in Ohio. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. 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

mkurtz@BKLawfirm.com

COUNSEL FOR THE OHIO ENERGY GROUP

December 17, 2008