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January 5, 2009

Renee J. Jenkins
Secretary
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

Re: In the Matter of the Application of The Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Sections 4928.143, Ohio Revised Code, in Case No. 08-935-EL-SSO

Dear Secretary Jenkins:

On December 23, 2008, in Case No. 08-935-EL-SSO, the Ohio Consumer and Environmental Advocates ("OCEA") filed a Motion to Reject Applicant's Rate Filings Under The Default Provisions For Standard Service Offers Pursuant to R.C. Chapter 4928 and a Motion For A Commission Order Directing Applicants To Submit Tariffs Consistent With Default Provisions. Consistent with the Public Utilities Commission of Ohio's ("Commission") Entry dated December 26, 2008, in Case No. 08-935-EL-SSO, The Ohio Manufacturers Association ("OMA") notes its support of the above-referenced motions filed by the OCEA.

By its Entry of December 26, 2008 the Commission required comments/objections to the tariff filings of First Energy be filed by noon today, January 5, 2009. In response thereto Nucor Steel Marion, Inc., made an extensive filing of its comments as to First Energy's effecting daily economic interruptions with inexplicable replacement power costs under its newly filed tariffs.

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It appears that First Energy's actions in the implementation of its interruptible power tariffs reflects a dramatic change in the "provisions, terms, and conditions" of its tariff offerings existing on July 31, 2008. The OMA hereby joins in the well reasoned and factually supported comments of Nucor Steel and others objecting to First Energy's tariff filings. Consistent with the Attorney Examiners holding the record open in this docket for updated information, the OMA submits as an attachment hereto three press releases evidencing First Energy's retaliatory responses to the Commission's Order modifying its proposed ESP, to the detriment of its customers, in general, and to its interruptible customers¹ specifically.

Respectfully submitted,

The Ohio Manufacturers' Association

By: 

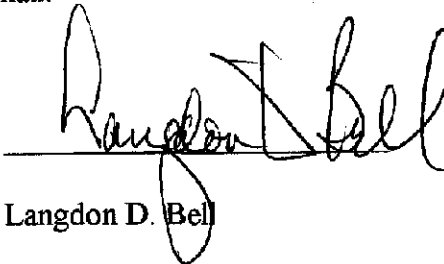
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¹ Attachment A. - Threatened shutdown of its Burger Units 4 and 5;
Attachment B - Commencement of a Competitive Bidding Process following rejection of its MRO; and,
Attachment C – Announcement of Successful Bids averaging 6.98¢/kWh.

CERTIFICATE OF SERVICE

I hereby certify that this 5th day of January 2009, a copy of the foregoing letter was served on all parties of record via electronic mail.



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Attachment A

<http://investors.firstenergycorp.com/phoenix.zhtml?c=102230&p=irol-newsArticle&ID=1239977&highlight=>

Attachment B

<http://investors.firstenergycorp.com/phoenix.zhtml?c=102230&p=irol-newsArticle&ID=1240115&highlight=>

Attachment C

<http://investors.firstenergycorp.com/phoenix.zhtml?c=102230&p=irol-newsArticle&ID=1240115&highlight=>

ATTACHMENT A

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News Release

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Deadline Extension Requested for Burger Plant Decision

AKRON, Ohio, Dec. 31 /PRNewswire-FirstCall/ -- FirstEnergy Corp. (NYSE: FE) announced today that it has requested additional time to make a decision regarding the future of two coal-fired units at its R.E. Burger Plant in Shadyside, Ohio.

Under the terms of a consent decree related to the company's 2005 New Source Review settlement - and absent an extension - FirstEnergy is required to make a decision by December 31, 2008, to either install scrubbers and other environmental equipment for Burger units 4 and 5, repower the units, or commit to shutting them down in the next two years. The company yesterday filed a motion with the U.S. District Court for the Southern District of Ohio, requesting an additional 105 days to make the decision.

"We are asking the Court for an extension, which would provide us with more time - and hopefully more economic and regulatory clarity - to make this important decision," said Charles D. Lasky, FirstEnergy's vice president of Fossil Operations.

In the event that the Court does not grant the motion for an extension, the company said it would elect to shut down Burger units 4 and 5 under the terms of the consent decree.

The Burger Plant, which employs 102 people, first came on line in 1944, with additional units completed in the 1950s. Today, units 4 and 5 provide a combined 312 megawatts (MW) of load-following power, enough to serve about 190,000 homes. A peaking unit rated at 94 MW remains in operation at the plant.

FirstEnergy is a diversified energy company headquartered in Akron, Ohio. Its subsidiaries and affiliates are involved in the generation, transmission and distribution of electricity, as well as energy management and other energy-related services. Its seven electric utility operating companies comprise the nation's fifth largest investor-owned electric system, based on 4.5 million customers served, within a 36,100-square-mile area of Ohio, Pennsylvania and New Jersey; and its generation subsidiaries control more than 14,000 megawatts of capacity.

Forward-Looking Statements: This news release includes forward-looking statements based on information currently available to management. Such statements are subject to certain risks and uncertainties. These statements include declarations regarding management's intents, beliefs and current expectations. These statements typically contain, but are not limited to, the terms "anticipate," "potential," "expect," "believe," "estimate" and similar words. Forward-looking statements involve estimates, assumptions, known and unknown risks, uncertainties and other factors that may cause actual results, performance or achievements to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements. Actual results may differ materially due to the speed and nature of increased competition in the electric utility industry and legislative and regulatory changes affecting how generation rates will be determined following the expiration of existing rate plans in Ohio and Pennsylvania, the impact of the PUCO's regulatory process on the Ohio Companies' associated with the Electric Security Plan and Market Rate Offer filings, including any resultant mechanism under which rates charged to retail customers may not fully recover the costs of energy supply, or the outcome of any competitive procurement process in Ohio to allow the Ohio Companies to provide energy supply for their customers, economic or weather conditions affecting future sales and margins, changes in markets for energy services, changing energy and commodity market prices and availability, replacement power costs being higher than anticipated or inadequately hedged, the continued ability of FirstEnergy's regulated utilities to collect transition and other charges or to recover increased transmission costs, maintenance costs being higher than anticipated, other legislative and regulatory changes, revised environmental requirements, including possible greenhouse gas emission regulations, the potential impacts of the U.S. Court of Appeals' July 11,

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Competitive Bidding Process to Begin for FirstEnergy

Ohio Utilities to Procure Electric Generation Supply

AKRON, Ohio, Dec. 22 /PRNewswire-FirstCall/ -- A competitive bidding process will be conducted for FirstEnergy's (NYSE: FE) Ohio utilities -- Ohio Edison, Cleveland Electric Illuminating Company and Toledo Edison -- to procure electric generation for delivery from January 5 through March 31, 2009, for retail customers who choose not to shop with an alternative supplier.

The competitive bidding process, which we believe satisfies the Federal Energy Regulatory Commission's four-step test established in a previous order involving Allegheny Energy, will use a Request for Proposal (RFP) format. The RFP will be managed by CRA International, a global consulting firm with expertise in energy markets and procurement. Individual bidders will not be permitted to serve more than 75 percent of the companies' load for non-shopping retail customers. Bidders will be required to certify that they are creditworthy, acting independently of other bidders, and making firm offers to provide generation service to customers.

Bids are due on December 31, 2008, for power to be supplied during the first quarter. A bid process consistent with the one described above will be conducted at a later date to meet customer supply needs beyond March 31, 2009.

The companies have set up a Web site to provide bidders with a central source of documents, data and other information for the bidding process. This information is available by accessing www.firstenergy-auction.com and clicking on "Ohio RFP." The contact for the RFP manager is Brad Miller, Vice President, CRA International, who can be reached at 617-425-3384, or RFPManager@crai.com.

The RFP is being conducted to ensure that customers have a reliable supply of electricity following the Public Utilities Commission of Ohio's actions to deny the companies' Market Rate Offer filing and significantly alter their Electric Security Plan (ESP). The companies have withdrawn their ESP application, as allowed for under Senate Bill 221. The companies, which do not own any electric generation, serve 2.1 million customers in Ohio.

FirstEnergy is a diversified energy company headquartered in Akron, Ohio. Its subsidiaries and affiliates are involved in the generation, transmission and distribution of electricity, as well as energy management and other energy-related services. Its seven electric utility operating companies comprise the nation's fifth largest investor-owned electric system, based on 4.5 million customers served, within a 36,100-square-mile area of Ohio, Pennsylvania and New Jersey; and its generation subsidiaries control more than 14,000 megawatts of capacity.

Forward-Looking Statements: This news release includes forward-looking statements based on information currently available to management. Such statements are subject to certain risks and uncertainties. These statements include declarations regarding management's intents, beliefs and current expectations. These statements typically contain, but are not limited to, the terms "anticipate," "potential," "expect," "believe," "estimate" and similar words. Forward-looking statements involve estimates, assumptions, known and unknown risks, uncertainties and other factors that may cause actual results, performance or achievements to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements. Actual results may differ materially due to the speed and nature of increased competition in the electric utility industry and legislative and regulatory changes affecting how generation rates will be determined following the expiration of existing rate plans in Ohio and Pennsylvania, the impact of the PUCO's regulatory process on the Ohio Companies associated with the Electric Security

ATTACHMENT C

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News Release

FirstEnergy Ohio Utilities Secure Supply of Power

Successful Competitive Process Results in Four Winning Bidders

AKRON, Ohio, Jan 02, 2009 /PRNewswire-FirstCall via COMTEX News Network/ -- FirstEnergy Corp. (NYSE: FE) announced today the completion of a successful competitive bidding process to ensure customers of its Ohio utilities - Ohio Edison, Cleveland Electric Illuminating Company (CEI) and Toledo Edison - continue to have a reliable supply of electricity.

The competitive bidding process, which was conducted on December 31, 2008, used a Request for Proposal (RFP) format and was managed by CRA International, a global consulting firm with expertise in energy markets and procurement.

CRA International reported that four qualified bidders were selected to supply electric generation for the period of January 5 through March 31, 2009. The average winning bid price is consistent with a retail rate of 6.98 cents per kilowatt-hour. The supply will be used to provide generation service to retail customers who choose not to shop with alternative suppliers. FirstEnergy Solutions, the company's competitive affiliate, was one of the successful bidders.

"I am pleased to report that the RFP process for the Ohio utilities of FirstEnergy was successful and was conducted in a fair, open, transparent and objective manner," said independent bid manager Brad Miller, Vice President, CRA International.

Because the companies initially will keep current tariff rates in place - as provided for under Senate Bill 221 - the results of the RFP will not immediately impact the price customers pay for electricity. Ultimately, the companies anticipate that customer prices for generation will reflect market prices.

A similar bid process is being planned to ensure customers continue to have a reliable supply of electricity beyond March 31, 2009.

The RFP was conducted following the Public Utilities Commission of Ohio's (PUCO) denial of the companies' Market Rate Offer (MRO) filing and the PUCO's recent order that significantly altered the companies' Electric Security Plan (ESP). On December 22, 2008, the companies withdrew their ESP application, as allowed for under Senate Bill 221, and separately asked the PUCO for rehearing of the MRO.

FirstEnergy is a diversified energy company headquartered in Akron, Ohio. Its subsidiaries and affiliates are involved in the generation, transmission and distribution of electricity, as well as energy management and other energy-related services. Its seven electric utility operating companies comprise the nation's fifth largest investor-owned electric system, based on 4.5 million customers served, within a 36,100-square-mile area of Ohio, Pennsylvania and New Jersey; and its generation subsidiaries control more than 14,000 megawatts of capacity.

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