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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the
Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The
Toledo Edison Company for Approval
of Rider FUEL and Related Accounting
Authority

Case No. 09-21-EL-ATA
Case No. 09-22-EL-AEM
Case No. 09-23-EL-AAM

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**MOTION FOR LEAVE TO INTERVENE BY
MATERIAL SCIENCES CORPORATION**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code, Material Sciences Corporation ("MSC") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in these proceedings as a full party of record. MSC's intervention should be granted because it has a real and substantial interest that is not represented by an existing party; its participation will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of issues raised in these proceedings. The Memorandum In Support of this motion is incorporated herein by reference. Wherefore, MSC requests that the Commission, its legal director, the deputy legal director, or the attorney examiner assigned to these matters, grant intervention in these proceedings as a full party of record.

Respectfully submitted,


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Case No. 09-21-EL-ATA
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**MEMORANDUM IN SUPPORT OF
THE MOTION TO INTERVENE BY
MATERIAL SCIENCE CORPORATION**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code, Material Science Corporation ("MSC") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in these proceedings as a full party of record. The primary business of MSC's Walbridge Coatings in Walbridge, Ohio is electro galvanizing or zinc-nickel plating of steel coils, laminating of steel coils, and painting of steel coils. The MSC Walbridge facility incurs more than \$3.8 million annually in electric costs for service from the Toledo Edison Company ("TE"). Electric costs at that facility have increased by 30% after TE terminated special contract rates in February 2008. TE now provides service under its PV-45 and Market Based Tariff tariffs to the MSC Walbridge facility.

In these proceedings Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively as the "Companies") request Commission approval of Rider FUEL, a surcharge on service to SSO Customers. The Companies intend for Rider FUEL to recover un-recovered prudently incurred costs for

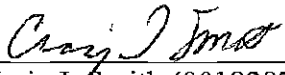
power purchases to render generation services to those customers until approval of MRO or ESP rate plans.

RC 4903.221 and OAC Rule 4901-1-11 set standards for intervention in Commission proceedings. MSC, as a SSO customer with substantial loads and electric costs, has a real and substantial interest not represented by an existing party. Intervention is necessary for MSC to protect those real and substantial interests. The Commission granted MSC intervention in the Companies MRO and ESP proceedings, Case No. 08-935-EL-SSO, and Case No. 08-936-EL-SSO. MSC's participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of issues raised in these proceedings.

MSC, with a real and substantial interest in these proceedings, timely files for, and is otherwise entitled to intervention under ORC 4903.221, and OAC 4901-1-11.

Wherefore, MSC requests that the Commission, its legal director, the deputy legal director, or the attorney examiner assigned to these matters, grant intervention in these proceedings as a full party of record.

Respectfully Submitted,




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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Intervene and Memorandum in Support was served this 11 day of February 2009 by electronic mail upon the persons listed below.


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