

FILE

FAX

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

Case No. 08-935-EL-SSO

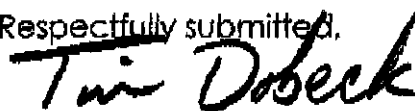
In the Matter of the Application of
Ohio Edison Company, The
Cleveland Electric Illuminating
Company and The Toledo Edison
Company for Approval of Rider FUEL
and Related Accounting Authority

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

MOTION TO INTERVENE ON BEHALF OF THE CITY OF PARMA

The City of Parma ("Parma"), by and through its Mayor Dean DePiero and Law Director Timothy G. Dobeck, respectfully moves the Public Utilities Commission of Ohio pursuant to R.C. § 4903.221 and O.A.C. § 4901-1-11 to grant its intervention in these proceedings for the reasons set forth in the following Memorandum in Support.

Respectfully submitted,



TIMOTHY G. DOBECK (0034699)
Law Director, City of Parma
6611 Ridge Road
Parma, OH 44129
(440) 885-8132
tdobeck@parmalaw.org

**ATTORNEY FOR INTERVENOR
CITY OF PARMA**

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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, the "Companies") filed an application for a standard service offer pursuant to R.C. § 4928.141. The application was for an electric security plan in accordance with R.C. § 4928.143. The outcome of this proceeding together with the Companies' Rider Fuel filing in Case Nos. 09-21-EL-ATA, et.al. will have a real and substantial impact on Parma and its citizens and no other party is uniquely positioned to represent the interest of Parma or its citizens in this proceeding.

For purposes of considering request for leave to intervene, O.A.C. § 4901-1-11(A) provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: . . . (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, R.C. § 4903.221(B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the

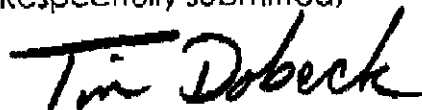
proceedings; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

OAC 4901-1-11(B) also provides the following factors in considering requests to intervene:

- (1) The nature of the person's interest; (2) The extent to which the person's interest is represented by existing parties; (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

Parma seeks to intervene and participate in this matter to represent the perspective of Parma's citizens relative to all issues that may arise. Parma is willing to accept the record as it exists as of the date this intervention is granted. To the extent that it is appropriate and efficient, Parma intends to coordinate its participation with that of other interested groups. Parma intends to participate fully in the remainder of these proceedings with a focus on protecting the interests of its residents and businesses located in Parma. Parma's participation 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, Parma requests that its Motion to Intervene be granted.

Respectfully submitted,



TIMOTHY G. DOBECK (0034699)

Law Director, City of Parma

6611 Ridge Road

Parma, OH 44129

(440) 885-8132

tdobeck@parmalaw.org

**ATTORNEY FOR INTERVENOR
CITY OF PARMA**

CERTIFICATE OF SERVICE

This is to certify that the foregoing Motion to Intervene on Behalf of
the City of Parma has been served upon all of the parties of record in
Case No. 08-935-EL-SSO by electronic mail this 3rd day of March, 2009.



TIMOTHY G. DOBECK

Law Director

Case 08-935-EL-SSO Service List

Robert Fortney
180 East Broad St.
3rd Floor
Columbus, OH 43215
E-mail: robert.fortney@puc.state.oh.us

Ohio Energy Group (OEG)

Michael L. Kurtz
David F. Boehm
Kurt J. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLawfirm.com
dboehm@BKLawfirm.com

Ohio Consumers' Counsel

Jeffrey L. Small
Gregory J. Poulos
Richard C. Reese
Ohio Consumers' Counsel
10 West Broad Street
18th Floor
Columbus, OH 43215-3485
small@occ.state.oh.us
poulos@occ.state.oh.us
roberts@occ.state.oh.us
reese@occ.state.oh.us

Kroger Co

John W. Bentline
Mark S. Yurick
Matthew S. White
Chester Wilcox & Saxbe, LLP
65 E. State St., Suite 1000
Columbus, OH 43215
jbentline@cwslaw.com
myurick@cwslaw.com
mwhite@cwslaw.com

Ohio Environmental Council

Barth E. Royer
Nolan Moser
Trent A. Dougherty
Bell & Royer, LPA
33 South Grant Avenue
Columbus, OH 43215
barthroyer@aol.com
nmoser@theoec.org
trent@theoec.org

Industrial Energy Users (IEU)

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

Ohio Partners for Affordable Energy

David C. Rinebolt
Colleen L. Mooney
(OPEA)
231 West Lima Street
PO BOX 1793
Columbus, OH 43215
E-mail: drinebolt@aol.com
cmooney2@columbus.rr.com

Nucor Steel Marion, Inc.

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
E-mail: gas@bbrslaw.com
mkl@bbrslaw.com

Northwest Ohio Aggregation Coalition (NOAC)

Toledo

Leslie A. Kovacic
420 Madison Ave., Suite 100
Toledo, OH 43604-1219
Phone: 419.245.1893
Fax: 419.245.1853
E-mail: leslie.kovacic@toledo.oh.gov

Lucas

Lance M. Keiffer
Lucas County Assist Prosecuting Atty
711 Adams St., 2nd Floor
Toledo, OH 43624-1680
Phone: 419.213.2001
Fax: 419.213.2011
E-mail: lkeiffer@co.lucas.oh.us

NOAC- Holland

Paul Skaff
Leatherman Witzler Dombey & Hart
353 Elm St.
Perrysburg, OH 43551
Phone: 419.874.3536
Fax: 419.874.3899
E-mail: paulskaff@justice.com

NOAC- Lake

Thomas R. Hays
Lake Township - Solicitor
3315 Centennial Road, Suite A-2
Sylvania, OH 43560
Phone: 419.843.5355
Fax: 419.843.5350
E-mail: hayslaw@buckeye-express.com

NOAC- Maumee

Sheilah H. McAdams
Marsh & McAdams - Law Director
204 West Wayne Street
Maumee, OH 43547
Phone: 419.893.4880
Fax: 419.893.5891
E-mail: sheilahmca@aol.com

NOAC- Northwood

Brian J. Ballenger
Ballenger & Moore - Law Director
3401 Woodville Rd., Suite C
Toledo, OH 43619
Phone: 419.698.1040
Fax: 419.698.5493
E-mail: ballengerlawbjb@sbcglobal.net

NOAC- Oregon

Paul S. Goldberg
Oregon - Law Director
6800 W. Central Ave.
Toledo, OH 43617-1135
Phone: 419.843.5355
E-mail: pgoldberg@ci.oregon.oh.us

NOAC- Sylvania

James E. Moan
Sylvania - Law Director
4930 Holland-Sylvania Rd
Sylvania, OH 43560
Phone: 419.882.7100
Fax: 419.882.7201
E-mail: jimmoan@hotmail.com

Constellation Energy Commodities Group, Inc., and Constellation NewEnergy, Inc.

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymore and Pease, LLP
52 East Gay Street
PO Box 1008
Columbus, OH 43216-1008
E-mail: mhpetricoff@vorys.com

Cynthia A. Fonner

Constellation Energy Resources, LLC
550 West Washington Blvd., Suite 300
Chicago, IL 60661

David I. Fein

Constellation Energy Group, Inc.
550 West Washington Blvd., Suite 300
Chicago, IL 60661

Integrus Energy Services, Inc.

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymore and Pease, LLP
52 East Gay Street
PO Box 1008
Columbus, OH 43216-1008
E-mail: mhpetricoff@vorys.com

Bobby Singh

300 West Wilson Bridge Road, Suite 350
Worthington, OH 43085
Phone: 614.844.4340
Fax: 614.844.4306
E-mail: bsingh@integrusenergy.com

Ohio Association of School Business Officials, Ohio School Boards Association, Buckeye Association of School Adms.

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

Direct Energy Services, LLC

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

Dominion Retail, Inc.

Barth E. Royer
Bell & Royer, LPA
33 South Grant Avenue
Columbus, OH 43215
Email: barthroyer@aol.com

Gary A. Jeffries
Dominion Resources Services, Inc.
501 Martindale Street, Suite 400
Pittsburg, PA 15212-5817
Gary.A.Jeffries@dom.com

Ohio Hospital Association

Richard L. Sites
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620
Phone: (614) 221-7614
Email: ricks@ohonet.org

Neighborhood Environmental Coalition, Consumers for Fair Utility Rates, United Clevelanders Against Poverty, Cleveland Housing Network, The Empowerment Center of Greater Cleveland (Citizens Coalition)

Joseph P. Meissner
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, OH 44113
Phone: 216.687.1900
Email: jpmeyssn@lasclev.org

National Energy Marketers Assoc.

Craig G. Goodman, Esq.
3333 K. Street, NW, Suite 110
Washington, D.C. 20007
Email:
cgoodman@energymarketers.com

City of Akron

Sean W. Vollman
161 S. High Street, Suite 202
Akron, OH 44308
Phone: 330.375.2030
Fax: 330.375.2041
E-mail: vollmse@ci.akron.oh.us
munteda@ci.akron.oh.us

The Ohio Manufacturers' Association

Langdon D. Bell
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215-3927
Email: lbell33@aol.com

Kevin Schmidt
The Ohio Manufacturers' Association
33 North High Street
Columbus, OH 43215-3005
kschmidt@ohiomfg.com

Ohio Farm Bureau Federation

Larry Gearhardt
Chief Legal Counsel
280 North High Street
Columbus, OH 43218-2383
Email: lgearhardt@otbf.org

Material Sciences Corporation

Craig I. Smith
2824 Coventry Road
Cleveland, Ohio 44120
Tel. (216) 561-9410
Email: wis29@yahoo.com

FPL Energy Power Marketing, Inc. (PMI/GEXA)

F. Mitchell Dutton
FPL Energy Power Marketing, Inc.
700 Universe Blvd.
Juno Beach, Florida 33408
Email: mitch.dutton@fpl.com

Dane Stinson
 Bailey Cavaleri LLC
 10 West Broad Street, Suite 2100
 Columbus, Ohio 43215
Dane.Stinson@BaileyCavaleri.com

The City of Cleveland
 Steven Beeler
 Gregory J. Dunn
 Christopher Miller
 Andre T. Porter
 Schottenstein Zox & Dunn Co., LPA
 250 West Street
 Columbus, OH 43215
 Email: gdunn@szd.com
cmiller@szd.com
aporter@szd.com

OmniSource Corporation
 Damon E. Xenopoulos, Esq.
 Brickfield, Burchette, Ritts & Stone, P.C.
 1025 Thomas Jefferson Street, N.W.
 8th Floor, West Tower
 Washington, D.C. 20007
 E-Mail: dex@bbrslaw.com

Citizen Power
 Theodore S. Robinson
 2121 Murray Avenue
 Pittsburgh, PA 15217
 Email: robinson@citizenpower.com

Ohio Schools Council,
 Glenn S. Krassen
 E. Brett Breitschwerdt
 Bricker & Eckler LLP
 1375 E. 9th St., Suite 1500
 Cleveland, OH 44114
 Email: gkrassen@bricker.com
bbreitschwerdt@bricker.com

NOPEC
 Glenn S. Krassen
 E. Brett Breitschwerdt
 Bricker & Eckler LLP
 1375 E. 9th St., Suite 1500
 Cleveland, OH 44114
 Email: gkrassen@bricker.com
bbreitschwerdt@bricker.com

COSE
 Steve Millard
 The Higbee Building
 100 Public Square, Suite 201
 Cleveland, OH 44113
smillard@cose.org

Wal-Mart Stores East LP and Sam's Club East, LP, Macy's Inc., and BJ's Wholesale Club, Inc. (Collectively, the "Commercial Group")
 Douglas M. Mancino
 McDermott Will & Emory LLP
 2049 Century Park East
 Suite 3800
 Los Angeles, CA 90067-3218
 Email: dmanicino@mwe.com

Grace C. Wung
 McDermott Will & Emery, LLP
 600 Thirteenth Street, N.W.
 Washington, DC 20005
gwung@mwe.com

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
sbloomfield@bricker.com
todonnell@bricker.com

Morgan Stanley Capital Group Inc.
 Douglas M. Mancino
 McDermott Will & Emory LLP
 2049 Century Park East
 Suite 3800
 Los Angeles, CA 90067-3218
 Email: dmanicino@mwe.com

Gregory K. Lawrence
 28 State Street
 McDermott Will & Emory LLP
 Boston, MA 02109
 Email: glawrence@mwe.com

Natural Resources Defense Council,

Henry W. Eckhart
50 West Broad Street, #2117
Columbus, Ohio 43215
henryeckhart@aol.com

The Sierra Club Ohio Chapter

Henry W. Eckhart
50 West Broad Street, #2117
Columbus, Ohio 43215
henryeckhart@aol.com