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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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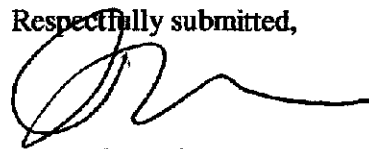
In The Matter Of The Proposal of
FirstEnergy Service Company to
Modify Its RTO Participation

)
) Case No. 09-778-EL-UNC
)

ENERNOC, INC.
MOTION TO INTERVENE

EnerNOC, Inc. moves to intervene¹ in this case where FirstEnergy Service Company proposes in its September 4, 2009 filing to modify its RTO participation by withdrawing from the Midwest Independent System Operator and joining PJM Interconnection. EnerNOC, Inc., a leading provider of clean and intelligent energy solutions, provides demand response services to Ohio electricity customers. The Public Utilities Commission of Ohio should grant EnerNOC's Motion to Intervene for reasons more fully discussed in the attached Memorandum in Support.

Respectfully submitted,



Jacqueline Lake Roberts, Counsel of Record
Senior Manager,
Regulatory Affairs and Public Policy

EnerNOC, Inc.
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¹ See, R.C. Chapter 4911, R.C. 4903.221 and Ohio Adm. Code 4901-I-II.

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September 23, 2009

In The Matter Of The Proposal of)
FirstEnergy Service Company to) Case No. 09-778-EL-UNC
Modify Its RTO Participation)

² R.C. 4903.221(B).

EnerNOC satisfies each of these criteria. The nature and extent of EnerNOC's interest in this proceeding involves the availability, terms and conditions of demand response services (Services) it provides to Ohio electricity customers. These Services are directly affected by the RTO participation of Ohio's load serving entities, in this case, FirstEnergy. EnerNOC's position is therefore directly related to the merits of this proceeding.

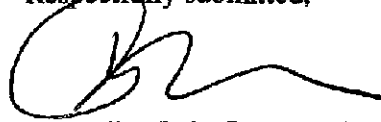
EnerNOC's interest is different from that of the FirstEnergy whose advocacy includes the financial interest of its shareholders. Finally, EnerNOC's intervention will not unduly prolong or delay the proceedings. EnerNOC has extensive regulatory experience before state and federal regulatory commissions allowing for the efficient processing of this proceeding. EnerNOC will contribute to the full development and equitable resolution of this proceeding.

EnerNOC also satisfies the intervention criteria of the Ohio Administrative Code that requires an intervening party to have a "real and substantial interest" in the proceeding.³ As a provider of demand response services to Ohio electricity customers, EnerNOC has a very real and substantial interest in these proceedings where the outcome could have an effect on the services it provides in Ohio.

EnerNOC meets the criteria set-forth above and the Commission should grant EnerNOC's Motion to Intervene.

³Ohio Adm. Code 4901-1-11(A)(2).

Respectfully submitted,



Jacqueline Lake Roberts, Counsel of Record
Senior Manager,
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene was served on the persons listed below via regular U.S. Mail Service, postage prepaid, this 23rd day of September, 2009.



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