

**BEFORE
THE PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison)	
Company, The Cleveland Electric Illuminating)	
Company and The Toledo Edison Company for)	Case No. 10-176-EL-ATA
Approval of a New Rider and Revision of an)	
Existing Rider.)	

**THE OHIO MANUFACTURERS' ASSOCIATION'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Revised Code ("O.R.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the Ohio Manufacturers' Association ("OMA") moves for leave to intervene in these proceedings. The Public Utilities Commission of Ohio ("PUCO") should grant the OMA leave to intervene because the OMA has a real and substantial interest in the proceeding, and the PUCO's disposition of this proceeding may impair or impede the OMA's ability to protect that interest.

MEMORANDUM IN SUPPORT

On February 12, 2010, Ohio Edison Company The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively "FirstEnergy") filed an Application with the Commission for approval of a new rider, Residential Generation Credits ("Rider RGC") which would provide rate credits to residential customers on certain rate schedules. At the same

time, FirstEnergy requested that its Economic Development Rider (“Rider EDR”) be revised to permit cost recovery through Rider EDR of the Rider RGC credits. Rider EDR, as presently constituted, is collected only from customers taking service under Rates GS and GP.

OMA is the only statewide association exclusively serving manufacturers, many of whom take service under Rates GS and GP. It has more than 1,600 Ohio manufacturing companies as members. OMA’s member companies consume medium to large amounts of electrical energy and must rely on their host electric distribution utilities of FirstEnergy, to deliver the electric power necessary in their operations. The OMA is very concerned about the interclass subsidy that FirstEnergy’s filing would create. As Ohio manufacturers struggle to recover from the worst recession since the Great Depression, the incurrence of the direct, incremental costs of service provided to other customers is more than usually burdensome.

The OMA should be permitted to intervene in the above-captioned proceedings because it has real and substantial interests. OMA is concerned that the ultimate resolution of these matters to be addressed in the above-captioned proceedings could have a substantial effect on the potential benefits of energy efficiency and demand reduction available to OMA members through FirstEnergy’s Application, as well as the overall electricity costs of OMA members in the service area of FirstEnergy.

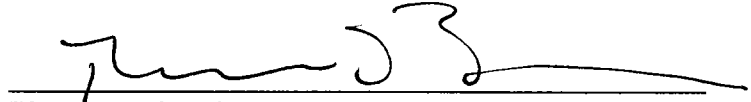
Consistent with the requirements of R.C. Section 4903.221, and OAC Rule 4901-1-11(B), OMA is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding or prejudice any existing party. OMA submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns that are set forth in

these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

OMA has a substantial interest in these proceedings that is not adequately addressed by any other party. OMA's participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

WHEREFORE, the Ohio Manufacturers' Association respectfully requests that its motion to intervene be granted.

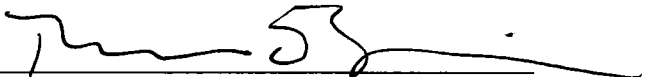
Respectfully submitted on behalf of
THE OHIO MANUFACTURERS' ASSOCIATION

A handwritten signature in black ink, appearing to read "T. O'Brien", is written over a horizontal line.

Thomas J. O'Brien
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2368; 227-2335
Facsimile: (614) 227-2390
e-mail: tobrien@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 1st day of March 2010 *via* first class mail.



Thomas J. O'Brien

James W. Burk
Senior Attorney
FirstEnergy Corp.
76 South Main Street
Akron, OH 44308

Jeffrey L. Small
Associate Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485

Joseph M. Clark
Samuel C. Randazzo
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215

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Summary: Motion to Intervene electronically filed by Teresa Orahood on behalf of Ohio Manufacturers' Association