

**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)	Case No. 12-2190-EL-POR
Approval Of Their Energy Efficiency And Peak)	Case No. 12-2191-EL-POR
Demand Reduction Program Portfolio Plans For)	Case No. 12-2192-EL-POR
2013 Through 2015.)	

MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Ohio Revised Code Section ("R.C.") 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the OMA Energy Group ("OMAEG") hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMAEG has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede the OMAEG's ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay this proceeding and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMAEG's interests will not be adequately represented by other parties to this proceeding. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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MEMORANDUM IN SUPPORT

On July 31, 2012, Ohio Edison Company ("OE"), The Cleveland Electric Illuminating Company ("CEI"), and the Toledo Edison Company ("TE", collectively, "FirstEnergy") filed an application for approval of their 2013-2015 Energy Efficiency and Peak Demand Reduction ("EE/PDR") Program Portfolio Plan, which is required to assure that FirstEnergy is in compliance with the state's energy efficiency benchmarks. The members of OMAEG will be impacted by the Commission's decision relating to FirstEnergy's EE/PDR Portfolio Plan, and the OMAEG should be permitted to intervene in the above-captioned proceeding.

The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from FirstEnergy, and will be affected by the Commission's

determination in this matter. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMAEG submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership.

Accordingly, the OMAEG respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

Respectfully submitted on behalf of
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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 12th day of September 2012 via electronic transmission and/or first class mail.



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Summary: Motion to Intervene and Memorandum in Support electronically filed by Teresa Orahod on behalf of OMA Energy Group