

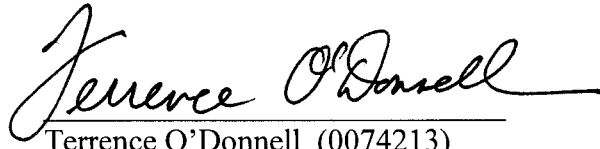
**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison)	
Company, The Cleveland Electric Illuminating)	Case No: 14-1297-EL-SSO
Company and The Toledo Edison Company for)	
Authority to Provide for a Standard Service)	
Offer Pursuant to R.C. 4928.143 in the Form)	
of an Electric Security Plan)	

**MOTION TO INTERVENE OF
THE MID-ATLANTIC RENEWABLE ENERGY COALITION**

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

Respectfully Submitted,

A handwritten signature in black ink, reading "Terrence O'Donnell". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

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MEMORANDUM IN SUPPORT

The above-captioned proceeding was initiated by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, the “Companies”) on August 4, 2014. The Companies initiated this proceeding in order to obtain Commission review and approval of its Standard Service Offer to be completed via the Electric Security Plan (“ESP”) proposed by the Companies.

By Entry dated August 13, 2014, the Commission established a procedural schedule for its consideration of the ESP requiring that impacted parties file motions to intervene by October 1, 2014. Thus, MAREC’s submission of this Motion is timely.

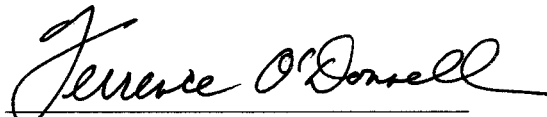
MAREC should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests in the proceeding. MAREC is a coalition of diverse wind developers, turbine manufacturers, and public interest organizations formed to educate policy makers and the general public about renewable energy issues in the PJM territory. MAREC also collaborates with other renewable energy industry partners. MAREC’s mission is to ensure that wind power establishes itself as one of the region’s leading energy resources, providing substantial environmental and economic benefits. MAREC is concerned that the ultimate

resolution of the matters to be addressed in this proceeding—including, without limitation, modifications to the Alternative Energy Rider and the source of generation proposed as part of the Economic Stability Program and Retail Rate Stability Rider—could have a substantial effect on the development of wind energy and other forms of renewable energy throughout the state and region.

Consistent with the requirements of R.C. Section 4903.221 and OAC Rule 4901-1-11, MAREC 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. MAREC 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 this proceeding; that its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party; and that its participation will help ensure that the proceeding is fair to its membership.

WHEREFORE, MAREC respectfully requests that its motion to intervene be granted.

Respectfully Submitted,

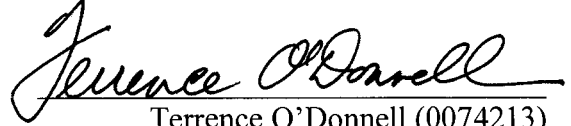
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Intervene and Memorandum in Support was served by electronic mail upon the following Parties of Record on this 30th day of September, 2014.


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Summary: Motion Motion to Intervene and Memorandum in Support electronically filed by Terrence O'Donnell on behalf of Mid-Atlantic Renewable Energy Coalition