

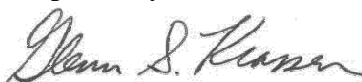
**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**OHIO SCHOOLS COUNCIL'S
MOTION TO INTERVENE**

Pursuant to R.C. §4903.221 and O.A.C. Rule 4901-1-11, the Ohio Schools Council ("OSC") respectfully requests that the Public Utilities Commission of Ohio grant OSC's motion to intervene in this proceeding. The reasons supporting OSC's intervention are contained in the accompanying Memorandum in Support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

On August 4, 2014, the Ohio Edison Company, The Cleveland Electric Illuminating Company and Toledo Edison Company (collectively “FirstEnergy”) filed an application for approval of its fourth electric security plan (“ESP IV”).

R.C. §4903.221(B) and O/A.C. Rule 4901-1-11(A)(2) govern intervention in Commission proceedings. Substantially similar in substance, these provisions explain that the Commission may consider the following in determining whether to grant intervention:

- (1) The nature and extent of the person’s interest;¹
- (2) The legal position of the person seeking intervention and its relation to the merits of the case;²
- (3) Whether intervention would unduly delay the proceeding or unjustly prejudice any existing party;³
- (4) The person’s potential contribution to full development and equitable resolution of the issues involved in the proceeding;⁴ and
- (5) The extent to which the person’s interest is represented by existing parties.⁵

¹ ORC 4903.221(B)(1) and OAC 4901-1-11(B)(1).

² ORC 4903.221(B)(2) and OAC 4901-1-11(B)(2).

³ ORC 4903.221(B)(3) and OAC 4901-1-11(B)(3).

⁴ ORC 4903.221(B)(4) and OAC 4901-1-11(B)(4).

⁵ OAC 4901-1-11(B)(5).

OSC is a regional council of governments established under Chapter 167 of the Ohio Revised Code and is comprised of approximately 197 school districts, educational service centers, joint vocational districts and developmental disabilities boards in 34 northern Ohio counties. Ohio Schools Council exists for the purpose of obtaining top quality products and services at the most competitive price through cooperative purchasing, including electric service. OSC has operated electricity purchasing programs for its members and other participating public school districts since 1998 in all three of the FirstEnergy service territories, and its members are significant electricity consumers of FirstEnergy.

OSC has a real and substantial interest in the above-captioned proceeding. FirstEnergy's proposed ESP IV seeks to continue and adopt various riders including, but not limited to, the Retail Rate Stability Rider and the Delivery Capital Recovery Rider, which may increase OSC members' cost of electric service. Moreover, the ESP IV proposes not to renew the School Credit Provision (Rider EDR(f)), which benefits certain of its members. As such, the Commission's decision in this case will have a direct and substantial impact on OSC's members and their ability to provide quality education to children in Ohio. OSC needs the status of a party to the proceeding to fully evaluate the Application and make appropriate recommendations to the Commission.

The legal issues intended to be raised by OSC directly relate to both the merits of the case and this proceeding's potential impact on OSC and its members and program participants.

Granting OSC's motion to intervene also will not unduly delay these proceedings, or unjustly prejudice any existing party, because OSC is filing this motion prior to the deadline for intervening as established by the Commission so there is not an issue of delay. OSC will work cooperatively with others in the case in order to maximize case efficiency where practical, but without compromising OSC's unique position in the State of Ohio.

OSC's intervention and involvement in this case will contribute to the development of a more complete understanding of the meaning and impacts of FirstEnergy's market rate offer on Ohio electricity consumers, specifically its member school districts and other school districts participating in its electric purchasing programs. Additionally, OSC was granted intervention, and actively participated in both CEI's last electric distribution rate case, Case No. 07-551-EL-AIR, et al., and FirstEnergy's electric security plan cases (PUCO Case Nos. 08-0935-EL-SSO and 12-1230-EL-SSO) to the benefit of all involved.

Finally, OSC submits that no current party represents its individual interests, and disposition of this proceeding without its participation will impair or impede OSC's ability to protect those interests.

WHEREFORE, and for the reasons set forth above, OSC respectfully requests that its motion to intervene be granted.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following parties of record by electronic mail this 1st day of October 2014.



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Case No(s). 14-1297-EL-SSO

Summary: Motion to Intervene of the Ohio Schools Council electronically filed by Teresa Orahod on behalf of Glenn S. Krassen