

**BEFORE**  
**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of  
FirstEnergy Corp. on Behalf of  
Ohio Edison Company, The  
Cleveland Electric Illuminating  
Company and The Toledo Edison  
Company for Approval for Their  
Transition Plans and for Authorization  
To Collect Transition Revenues.

Case No. 99-1212-EL-ETP  
Case No. 99-1213-EL-ATA  
Case No. 99-1214-EL-AAM

In the Matter of the Application of  
The Cincinnati Gas & Electric Company )  
For Approval of its Electric Transition Plan )  
Approval of Tariff Changes and New )  
Tariffs, Authority to Modify Current )  
Accounting Procedures, and Approval )  
To Transfer its Generating Assets to an )  
Exempt Wholesale Generator.

Case No. 99-1658-EL-ETP  
Case No. 99-1659-EL-ATA  
Case No. 99-1660-EL-ATA  
Case No. 99-1661-EL-AAM  
Case No. 99-1662-EL-AAM  
Case No. 99-1663-EL-UNC

In the Matter of the Application of the  
Dayton Power & Light Company for  
Approval of its Transition Plan, for  
The Opportunity to Receive Transition  
Revenues, for Approval to Change  
Accounting Methods, and Approval to  
Amend its Tariff.

Case No. 99-1687-EL-ETP  
Case No. 99-1688-EL-AAM  
Case No. 99-1689-EL-ATA

In the Matter of the Applications of  
Columbus Southern Power Company  
And Ohio Power Company for Approval  
Of Their Electric Transition Plans and  
For Receipt of Transition Revenues.

Case No. 99-1729-EL-ETP  
Case No. 99-1730-EL-ETP

In the Matter of the Application of  
Monongahela Power Company dba  
Allegheny Power for Approval of an  
Electric Transition Plan

Case No. 00-02-EL-ETP

**MOTION OF COALITION FOR CHOICE IN ELECTRICITY**  
**FOR**  
**COMPLIANCE TARIFF FILING, SERVICE, REVIEW, AND COMMENT**  
**PROCEDURES**

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Case No. 99-1213-EL-ATA  
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Case No. 99-1729-EL-ETP  
Case No. 99-1730-EL-ETP

Case No. 00-02-EL-ETP

**MOTION OF COALITION FOR CHOICE IN ELECTRICITY  
FOR  
COMPLIANCE TARIFF FILING, SERVICE, REVIEW, AND COMMENT  
PROCEDURES**

Now Comes the Coalition for Choice in Electricity (“CCE”) and its individual members and respectfully request that the Public Utilities Commission of Ohio (“Commission”) establish procedures for filing, service, review, and comment related to

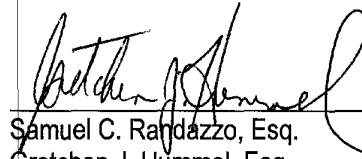


the tariffs anticipated to be filed pursuant to the Commission Opinion and Orders to be issued in the above-styled electric restructuring transition plan proceedings.

Specifically, it is requested that the Commission require that tariff filings ultimately required in these proceedings be accompanied by all relevant workpapers and be served on intervenors simultaneous with filing at the Commission. Additionally, it is requested that the Commission permit two weeks subsequent to receipt of service of the tariffs and accompanying workpapers for intervenor review and comment prior to Commission consideration for approval.

This request is supported by and made for the reasons set forth in the attached Memorandum in Support, which is fully incorporated herein.

Respectfully submitted,



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**BEFORE**  
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Ohio Edison Company, The  
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In the Matter of the Application of the  
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In the Matter of the Application of  
Monongahela Power Company dba  
Allegheny Power for Approval of an  
Electric Transition Plan

Case No. 00-02-EL-ETP

**MEMORANDUM IN SUPPORT**

Subsequent to the closing of the record and the submission of briefs (or upon consideration of an uncontested stipulation and agreement), the Commission will issue an opinion and order in each of the above-styled transition plan proceedings in which it is expected that the applicants will be ordered to file tariffs consistent with the Commission's findings. These tariffs will establish services, rates, practices, and



procedures that will implement significant changes to provision of electric service and the operations of the electric industry in Ohio. CCE submits that, because of the broad-sweeping changes that will be subject to the provisions of the tariffs ultimately approved in these proceedings, the broadest possible review prior to approval is necessary to ensure the likelihood that the tariffs implemented accurately reflect the various statutory provisions, Commission rules, and stipulated agreements among the parties.


Consequently, CCE requests that the Commission order the Applicants in the above-styled cases to serve tariffs and accompanying workpapers on intervenors simultaneous with filing with the Commission. Additionally, it is requested that the Commission provide a two-week period after the date of receipt of the tariffs and accompanying workpapers for intervenors to review the tariffs and workpapers and submit comments to the Commission for its consideration prior to approval of the tariffs.

WHEREFORE, it is respectfully submitted that the Commission request the grant this Motion for the reasons presented herein.

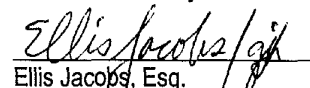
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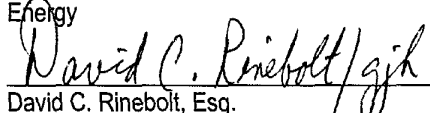
  
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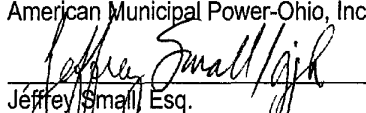
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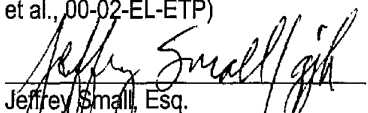
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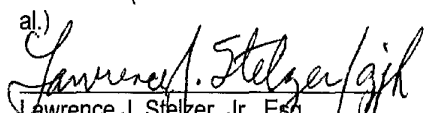
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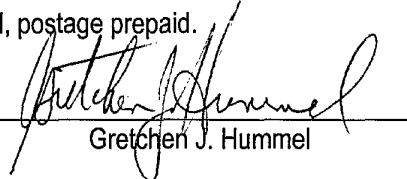
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I hereby certify that a copy of the foregoing *Motion of Coalition for Choice in Electricity For Compliance Tariff Filing, Service, Review, and Comment Procedures* was served upon the following parties of record this 27<sup>th</sup> day of June 2000, via electronic transmission, hand-delivery, or ordinary U.S. mail, postage prepaid.

  
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