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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Monongahela Power Company for)
Approval of Transition Plan pursuant to)
4928.31, Revised Code and for the) Case No. 00-2-EL-ETP
Opportunity to Receive Transition)
Revenues as Authorized under 4928.31 to)
4928.40, Revised Code)

**MOTION TO INTERVENE OF FIRSTENERGY CORP.,
ON BEHALF OF OHIO EDISON COMPANY,
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,
AND THE TOLEDO EDISON COMPANY**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11 of the Ohio
Administrative Code, FirstEnergy Corp., on behalf of its Ohio operating companies, Ohio Edison
Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company,
files this motion to intervene. The basis for this motion is fully set forth in the accompanying
Memorandum in Support.

Respectfully submitted,

Arthur E. Korkosz / Hu

Arthur E. Korkosz
Trial Attorney
Stephen L. Feld
Senior Attorney
James W. Burk
Attorney
FirstEnergy Corp.
76 South Main Street
Akron, OH 44308
(330) 384-5849
Fax: (330) 384-3875

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**MEMORANDUM IN SUPPORT OF
MOTION TO INTERVENE OF FIRSTENERGY CORP.,
ON BEHALF OF OHIO EDISON COMPANY,
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,
AND THE TOLEDO EDISON COMPANY**

FirstEnergy Corp., on behalf of its Ohio operating companies, Ohio Edison company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, "FirstEnergy"), requests that it be granted leave to intervene in this proceeding. FirstEnergy meets the standard for intervention set out in Section 4903.221, Revised Code, and in Rule 4901-1-11, Ohio Administrative Code.

FirstEnergy has a real and substantial interest in this proceeding. All of Ohio's electric utilities have transition plans pending before the Commission. Many of the issues to be addressed by the Commission will be similar from case to case, and therefore the issues that will be addressed in the Monongahela Power Company ("Monongahela") transition plan case may have a direct impact on FirstEnergy, especially if the issues are being deliberated contemporaneously in this and FirstEnergy's case or if this case is decided first. In light of the short time given to the Commission to decide these cases, it is even more likely that the decision in the first case on any common issue will govern its resolution in subsequent cases. Under those circumstances, the disposition of the issues in this case may impair FirstEnergy's ability to protect its interest.

That is particularly true with respect to the issue of identifying transmission and distribution facilities. In Case No. 98-1633-EL-UNC, FirstEnergy filed an application seeking Commission approval of the transfer of certain transmission assets to American Transmission Services, Inc. ("ATSI"). FirstEnergy used the seven factor test established by the Federal Energy Regulatory Commission to classify transmission and distribution facilities for the purposes of determining the facilities to be transferred to ATSI and for setting transmission rates. By Finding and Order of February 17, 2000, the Commission approved the transfer, but found that the question of the appropriate demarcation between FirstEnergy's transmission and distribution facilities should be addressed in FirstEnergy's transition plan case. This issue is common to all of the electric utilities' transition plan cases, and the Staff has suggested that this is one of the issues that will be decided uniformly for all of the electric utilities. Consequently, FirstEnergy must be permitted to participate in this case in order to protect its interest with respect to the classification of its transmission and distribution facilities.

There also may be some attempt to impose uniformity on all of the electric utilities with respect to operational support systems. Several of the intervenors have suggested that the Commission adopt certain national standards, and, in its November 30, 1999 Finding and Order in Case No. 99-1141-EL-ORD, the Commission indicated its support for the establishment of standard business practices. Consequently, if this matter is not resolved through the taskforce process and is litigated, a Commission decision on the issue in this case will affect FirstEnergy's interest.

FirstEnergy also has an interest in the independent transmission plan aspects of this case. The Commission ultimately will have to determine whether particular regional transmission organizations meet the test set out in Section 4928.12(B), Revised Code, for qualifying transmission entities. While FirstEnergy did not include a transmission plan as part of

its transition plan filing, it did indicate its intention to join the Alliance RTO. Monongahela has filed a transmission plan in which it has stated that it has three choices from which to choose an RTO: the Alliance RTO, the MidWest ISO, and the PJM ISO. Thus, the Commission in this case may be determining specifically whether the Alliance RTO satisfies the statutory criteria. Even if the Commission focuses on one of the other two entities, any decision in this case regarding the manner in which a transmission entity meets the statutory test could affect the ultimate determination regarding FirstEnergy's proposal to join the Alliance RTO. This issue is extremely important to FirstEnergy, and its participation in this case is therefore vital to protecting its interest.

FirstEnergy's interest is not adequately represented by existing parties. No other party comes to this case with the perspective of FirstEnergy, not even Monongahela. Because certain issues common to this case and FirstEnergy's restructuring case may be more significant to FirstEnergy than they are to Monongahela, FirstEnergy will not be adequately represented by Monongahela. Because of the likelihood that the Commission will apply its decision uniformly on certain significant issues, FirstEnergy must be permitted to intervene in this case to adequately represent its interests.

FirstEnergy will contribute to the full development of the record and to a just and expeditious resolution of the issues in this proceeding. FirstEnergy was active in the legislative process that led to Amended Senate Bill No. 3 ("S.B. 3") and in the proceeding before the Commission involving the promulgation of rules to implement S. B. 3. Because of its long and active involvement in the process that led to this case, FirstEnergy's participation will enhance the quality of the record here. Moreover, Ohio Edison Company's Pennsylvania operating company, Pennsylvania Power Company, is operating now in a restructured environment. FirstEnergy thus brings to this case the utility perspective on the restructuring experience.

FirstEnergy's intervention will not unduly prolong or delay the proceeding or unjustly prejudice any existing party. This motion is timely filed, and granting the motion will not cause any change in the procedural schedule in this case. FirstEnergy will, of course, adhere to the deadlines prescribed in the applicable statutes and Commission rules and orders.

For these reasons, FirstEnergy respectfully requests that it be granted leave to intervene and to participate fully in this proceeding.

Respectfully submitted,

Arthur E. Korkosz/HU

Arthur E. Korkosz
Trial Attorney
Stephen L. Feld
Senior Attorney
James W. Burk
Attorney
FirstEnergy Corp.
76 South Main Street
Akron, OH 44308
(330) 384-5849
Fax: (330) 384-3875

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene of Firstenergy Corp., on Behalf of Ohio Edison Company, the Cleveland Electric Illuminating Company, And The Toledo Edison Company, was served upon the following via First Class U.S. Mail this 3rd day of March, 2000:

Samuel C. Randazzo, Esq.
Kimberly J. Wile, Esq.
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street, Suite 1700
Columbus, OH 43215-4228

M. Howard Petricoff, Esq.
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
2110 CBLD Center
36 East Seventh Street
Cincinnati, OH 45202

David C. Rinebolt, Esq.
Ohio Partners for Affordable Energy
337 South Main Street, 4th Floor, Suite 5
P.O. Box 1793
Findlay, OH 45840

Joelle Kay Ogg, Esq.
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, DC 20036-3013

George Walen
Union Local 175
2307 Embury Park Rd.
Dayton, OH 45414-5599

Ellis Jacobs, Esq.
333 West First Street, Suite 500
Dayton, OH 45402

Sheldon A. Taft, Esq.
Joseph C. Blasko, Esq.
Vorys, Sater, Seymour & Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

John W. Bentine, Esq.
Jeffrey L. Small, Esq.
Chester, Willcox & Saxbe LLP
17 South High St., Suite 900
Columbus, OH 43215

Robert P. Mone, Esq.
Thompson Hine & Flory LLP
10 West Broad Street, Suite 700
Columbus, OH 43215

Michael D. Dortch, Esq.
Baker & Hostetler
65 East State Street, Suite 2100
Columbus, OH 43215

Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
2110 CBLD Center
36 East Seventh Street
Cincinnati, OH 45202

Langdon D. Bell, Esq.
Bell, Royer & Sanders Co., LPA
33 S. Grant Avenue
Columbus, OH 43215-3927

Steven M. Sherman
111 Monument Circle, Suite 2200
Indianapolis, IN 46204

Beverly E. Jones
CNG Tower
625 Liberty Avenue
Pittsburgh, PA 15222-3199

And upon the following by Facsimile and First Class U.S. Mail:

Gary A. Jack
Allegheny Power
1310 Fairmont Avenue
Fairmont, WV 26554

Arthur E. Korkosz/Hu
Arthur E. Korkosz