

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

**In the Matter of the Review of the Non
Market-Based Services Rider Pilot Program
Established by Ohio Edison Company, The
Cleveland Electric Illuminating Company, and
The Toledo Edison Company**

Case No. 23-0051-EL-RDR

**UTILITY WORKERS UNION OF AMERICA, LOCAL 270, AFL-CIO
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Revised Code Section 4903.22.1 and Ohio Administrative Code Section 4901-1-11, The Utility Workers Union of America, Local 270, AFL-CIO (“UWUA, Local 270”) moves to intervene in this proceeding.

The Public Utility Commission of Ohio (“PUCO”) should grant UWUA, Local 270 leave to intervene because UWUA, Local 270 has a real and substantial interest in this proceeding.

Respectfully submitted,

s/ Christopher E. Ericksen

President
UWUA, Local 270, AFL-CIO
1400 E. Schaaf Rd.
Brooklyn Heights, OH, 44131
Cell- (440) 220-0799
ceericksen@gmail.com