

**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

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE OF THE
UTILITY WORKERS UNION OF AMERICA, LOCAL 270, AFL-CIO**

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

UWUA, Local 270 has a real and substantial interest in these proceedings. Local 270 is the collective bargaining representative for over six hundred employees of the Cleveland Electric Illuminating Company.

The members of UWUA, Local 270 perform a wide variety of tasks including construction, operation, maintenance and support of northeast Ohio’s transmission and distribution systems, the associated substations, and the operation of the synchronous condenser unit in Eastlake, Ohio. UWUA, Local 270 has a strong interest in ensuring that the proceedings initiated by FirstEnergy before the PUCO do not adversely affect the membership of Local 270, do not interfere with the proper and safe performance of their job duties and do not result in unfair and inappropriate charges being passed on to the consumer. Frequently, the only contact those consumers have with FirstEnergy is through a member of Local 270. The interests of UWUA, Local 270 and its members may be affected by the outcome of this proceeding.

UWUA, Local 270 intends to play a constructive role in these proceedings and this intervention will not unduly delay these proceedings. In fact, Local 270 submits that any intervention granted to it will enhance the proceedings and ensure that they are fair and equitable to the membership, other employees of FirstEnergy and the consumers.

UWUA, Local 270 further submits that no other party to these proceedings can adequately represent the interests of UWUA, Local 270.

Accordingly, UWUA, Local 270 respectfully submits that the PUCO should grant its motion to intervene.

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