**BEFORE THE**

**PUBLIC UTILITIES COMMISSION OF OHIO**

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

**MOTION TO INTERVENE OUT OF TIME**

**OF CPV SHORE, LLC**

Pursuant to Section 4903.221 of the Revised Code and Rule 4901-1-11 of the Ohio Administrative Code, CPV Shore, LLC (“CPV Shore”) hereby moves for leave to intervene out of time in the above-captioned proceeding. As further explained in the accompanying Memorandum in Support, CPV has a real and substantial interest in this matter that cannot adequately be represented by any other party.

WHEREFORE, CPV Shore respectfully requests that its Motion to Intervene Out of Time be granted and that it be made a full party of record in this proceeding.

|  |  |
| --- | --- |
| Dated: January 23, 2015  \**Pro hac vice* motion pending | Respectfully submitted,  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Daniel W. Wolff (#0074168)  Richard Lehfeldt\* (PHV #2651-2015)  Crowell & Moring LLP  1001 Pennsylvania Ave., N.W.  Washington, DC 20004  Tel: (202) 624-2621  Fax: (202) 624-5116  dwolff@crowell.com  rlehfeldt@crowell.com  *Counsel for CPV Shore, LLC* |

.