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PUCO

VIA OVERNIGHT MAIL

May 14, 2007

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

In re: Case No. 07-551-EL-AIR, 07-552-EL-ATA, 07-553-EL-AAM and 07-554-EL-UNC

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of the Petition to Intervene of the Ohio Energy Group filed in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

MLKkew Encl.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by regular mail, unless otherwise noted, this 14th day of May, 2007 to the following:

Kolich, Kathy Attorney At Law FirstEnergy Corp 76 South Main Street Akron Oh 44308

Feld, Stephen L FirstEnergy Service Company 76 South Main Street Akron Oh 44308

> David F. Boehm, Esq. Michael L. Kurtz, Esq.

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Ohio Edison

Company The Cleveland Electric Illuminating Company And The Toledo Edison Company For Authority To Increase Rates For Distribution Service, Modify Certain Accounting Practices And

For Tariff Approvals.

Case Nos. 07-551-EL-AIR

07-552-EL-ATA

07-553-EL-AAM

07-554-EL-UNC

THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group. ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

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COUNSEL FOR OHIO ENERGY GROUP

BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In The Matter Of The Application Of Ohio Edison Company The Cleveland Electric Illuminating Company And The Toledo Edison Company For Authority To Increase Rates For Distribution

Service, Modify Certain Accounting Practices And For Tariff Approvals.

Case Nos. 07-551-EL-AIR

07-552-EL-ATA

07-553-EL-AAM

07-554-EL-UNC

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MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP'S MOTION TO INTERVENE

Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant The OEG Co. ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Air Products & Chemicals, Inc., AK Steel Corporation, BP Products North America, DaimlerChrysler Corp., Ford Motor Company, Mittal Steel, Inc., North Star BlueScope Steel, LLC, PPG Industries, Inc., Republic Engineered Products, Inc., WCI Steel, Inc., Worthington Industries, and V&M Star. These companies purchase electric distribution services from First Energy. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

David F. Boehm, Esq. Michael L. Kurtz, Esq.

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May 14, 2007