

LOCAL 270

UTILITY WORKERS UNION OF AMERICA

AFFILIATED WITH THE AFL-CIO

LIGHT-HEAT  
4205 CHESTER AVENUE



POWER-WATER  
CLEVELAND, OHIO 44103-3615

TELEPHONE: (216) 881-0004  
FAX: (216) 881-1333

July 31, 2007

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

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In re: Case No 07-796-EL-ATA and 07-797-EL-AAM

Dear Sir/Madam:

Please find enclosed two original (2) copies of THE PETITION TO INTERVENE BY THE UTILITY WORKERS UNION OF AMERICA, LOCAL NUMBER 270 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.

Sincerely,

Robert N. Fronck

Robert N. Fronck  
Local 270, UWUA, AFL-CIO  
4205 Chester Avenue  
Cleveland, Ohio 44103  
Ph. 216.881.0004  
Fax: 216.881.1333  
E-Mail: [rnf270@yahoo.com](mailto:rnf270@yahoo.com)  
President of Local 270  
UWUA, AFL-CIO

Carl Wood  
Regulatory Affairs Director  
Utility Workers Union of America  
10103 Live Oak Ave.  
Cherry Valley, CA 92223

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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 July 31, 2007 to the following:

Cleveland Electric Illuminating Co  
Harvey Wagner VP and Controller  
76 S. Main Street  
Akron Oh 44308

James Burk, Attorney-At-Law  
FirstEnergy Service Company  
76 South Main Street  
Akron Oh 44308

Toledo Edison Company  
Harvey Wagner, VP and Controller  
76 S. Main Street  
Akron Oh 44308

Ohio Consumers Counsel  
Jeffrey Small  
10 W. Broad Street Suite 1800  
Columbus Oh 43215-3485

Ohio Energy Group  
David Boehm  
Michael L. Kurtz  
36 East Seventh Street  
Suite 1510  
Cincinnati, Ohio 45202

FirstEnergy Service Company  
Rick C. Giannantonio  
76 South Main Street  
Akron, Ohio 44308  
On behalf of FirstEnergy Solutions

David C. Rinebolt  
Coleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
P.O. Box 1793  
Findley, Oh 45839-1793

Duane Luckey  
Assistant Attorney General  
Public Utilities Section  
180 E. Broad Street, 12<sup>th</sup> Floor  
Columbus, Ohio 43215

Samuel Randazzo  
McNees, Wallace and Nurick  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215-4228

Richard Sites  
Ohio Hospital Association  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, Ohio 43215



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Robert N. Fronck  
Carl Wood

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

**In The Matter Of The Application Of Ohio Edison )  
Company The Cleveland Electric Illuminating ) Case Nos. 07-796-EL-ATA  
Company And The Toledo Edison Company To ) 07-797-EL-AAM  
Establish a Competitive Bidding Process )**

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**UTILITY WORKERS UNION OF AMERICA, LOCAL NUMBER 270  
MOTION FOR LEAVE TO INTERVENE**

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Pursuant to the Ohio Revised Code §4903.22.1 and Ohio Administrative Code §4901-1-11, the Utility Workers Union of America, Local Number 270 ("UWUA Local 270") moves for leave to intervene in this proceeding.

The Public Utility Commission of Ohio ("Commission") should grant UWUA Local 270 leave to intervene because UWUA Local 270 has a real and substantial interest in the proceeding.

Respectfully submitted,



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Robert N. Fronck  
Local 270, UWUA, AFL-CIO  
4205 Chester Avenue  
Cleveland, Ohio 44103  
Ph. 216.881.0004  
Fax: 216.881.1333  
E-Mail: [rmf270@yahoo.com](mailto:rmf270@yahoo.com)  
President of Local 270  
UWUA, AFL-CIO

Carl Wood  
Regulatory Affairs Director  
Utility Workers Union of America  
10103 Live Oak Ave.  
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Establish a Competitive Bidding Process. )**

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

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Pursuant to Ohio Revised Code §4903.22.1 and Ohio Administrative Code §4901-01-11, the Public Utility Commission of Ohio ("Commission") should grant leave to intervene of the Utility Workers Union of America, Local Number 270 ("UWUA Local 270") in this proceeding.

UWUA Local 270 has a real and substantial interest in these proceedings. Local 270 is the collective bargaining representatives that represent over 1000 employees of the Cleveland Electric Illuminating Company.

The members of UWUA Local 270 perform a wide variety of tasks including the operation and maintenance of three (3) fossil fueled power plants and one (1) nuclear power plant. UWUA Local 270 and its membership have a strong interest in ensuring that the proceedings initiated by FirstEnergy before the Commission 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 or inappropriate charges being passed on to the consumer. The interests of UWUA Local 270 members may be directly 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 intervention granted to it will enhance these proceedings and ensure that the proceedings

are fair and equitable to its membership, other employees of FirstEnergy and to the consuming public.

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

Accordingly, UWUA Local 270 respectfully submits that the Commission should grant its Motion to Intervene.

Respectfully submitted,



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Robert N. Fronck  
Local 270, UWUA, AFL-CIO  
4205 Chester Avenue  
Cleveland, Ohio 44103  
Ph. 216.881.0004  
Fax: 216.881.1333  
E-Mail: rnf270@yahoo.com  
President of Local 270  
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Carl Wood  
Regulatory Affairs Director  
Utility Workers Union of America  
10103 Live Oak Ave.  
Cherry Valley, CA 92223