

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Application of Ohio Edison )  
Company, The Cleveland Electric Illuminating )  
Company, and The Toledo Edison Company )  
For Approval of a Competitive Bidding Process )  
For Standard Service Offer Electric Generation )  
Supply, Accounting Modifications Associated )  
With Reconciliation Mechanism and Phase In, )  
And Tariffs for Generation Service )

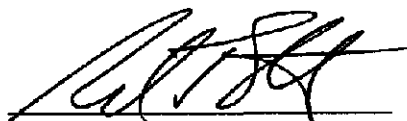
Case No. 07-796-EL-ATA  
Case No. 07-797-EL-AAM

MOTION TO INTERVENE  
BY  
THE CLEVELAND FOUNDATION

Pursuant to R.C. Chapter 4911, R.C. 4903 221, Ohio Adm. Code 4901-1-11 and 4901-1-12, The Cleveland Foundation ("TCF") moves the Public Utilities Commission of Ohio ("PUCO" or "Commission") to grant TCF's intervention in the above-captioned cases. These cases were filed on July 10, 2007 by the electricity distribution utilities ("EDUs") of FirstEnergy. The reasons for granting TCF's motion are further set forth in the attached Memorandum in Support.

Respectfully submitted,

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For Standard Service Offer Electric Generation	)	
Supply, Accounting Modifications Associated	)	
With Reconciliation Mechanism and Phase In,	)	
And Tariffs for Generation Service	)	

**MEMORANDUM IN SUPPORT**

**I. INTRODUCTION**

TCF moves to intervene in the above-captioned docket in order to represent the interests of the millions of residents, as well as thousands of businesses and institutions, in the Greater Cleveland area – most of whom are served by FirstEnergy EDUs.

On July 10, 2007, the FirstEnergy EDUs filed an application pursuant to R.C. 4928.14 and Ohio Adm. Code 4901:1-35 regarding a competitive bidding process “designed to procure supply for the provision of Standard Service Offer electric generation service....to the companies’ retail electric customers.” The proposed process, if approved by the Commission, would have significant implications on the sources and prices of electricity sold by FirstEnergy EDU’s to their customers, including many in Greater Cleveland, beginning on January 1, 2009.

## **II. INTERVENTION**

R.C. 4903.221 provides, in part, that any person “who may be adversely affected” by a PUCO proceeding is entitled to seek intervention in that proceeding.

Since its founding in 1914, TCF has been widely viewed as a responsible representative of the overall public interests of Greater Cleveland, pursuing a mission to enhance the lives of all residents of Greater Cleveland. The interests of TCF’s constituency – all of the households, businesses and institutions in the Cleveland area, most of whom are served by FirstEnergy EDUs – clearly may be “adversely affected” by this case. It is possible that regulatory agreements reached at the conclusion of this case will serve or protect the interests of other constituencies at the expense of the overall set of constituencies from Greater Cleveland. Furthermore, the regulatory framework within which FirstEnergy’s EDUs operate has a substantial influence on overall economic activity in the Cleveland area, which is of significant interest to TCF and its constituents. Therefore, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C.4903.221 (B) requires the Commission to consider the following criteria in ruling on motions to intervene:

- 1) The nature and extent of the prospective intervenor’s interest;
- 2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- 3) Whether this intervention by the prospective intervenor will unduly prolong or delay the proceeding; and

- 4) Whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues.

First, the nature and extent of TCF's interest in this case lies in ensuring that the best interests of all Cleveland area stakeholders are well-served by the regulatory agreements that are ultimately implemented for the FirstEnergy EDUs that serve the Cleveland area. TCF's interest in this case involves multiple sometimes-competing objectives, including (but not necessarily limited to) minimizing energy prices to all customers, minimizing emissions associated with electricity generation, maximizing electricity service reliability and quality, and encouraging economic development. Because these objectives sometimes compete against each other, tradeoffs are often required, and TCF is well-positioned to make fair and balanced judgments on such tradeoffs, because TCF lacks any proprietary (profit or political) interests to protect or advance.

Second, TCF's general position on this case will be to seek regulatory agreements applying to FirstEnergy EDU's that maximally promote local economic development, given the weak economic conditions that plague the Cleveland area. Furthermore, TCF holds the position that Cleveland's economic revitalization can best be fostered by encouraging adoption of advanced energy solutions, creating vibrant markets for both renewable energy supply and energy efficiency.

Third, TCF's intervention will not unduly prolong the proceeding. TCF anticipates making no verbal commentary in this case during any hearings.

Fourth, TCF's intervention will significantly contribute to the full development and equitable resolution of the factual issues. TCF is widely recognized by many

parties in Ohio to be a thought-leader on a variety of energy-related topics, particularly regarding advanced energy.

TCF also satisfies the intervention criteria in the Ohio Administrative Code, which are subordinate to the criteria that TCF satisfies in the Ohio Revised Code. To intervene, a party should have a “real and substantial interest” according to Ohio Adm. Code 4901-1-11 (A)(2). As a long-respected institution working to advance the common cause of all constituents in the Cleveland area, and as one of the recognized thought-leaders in Ohio on energy matters, TCF has a real and substantial interest in this case, in which the future supplies and pricing of electricity service for many Cleveland area residences, businesses and institutions are at issue.

In addition, TCF meets the criteria of Ohio Adm. Code 4901-1-1 (B)-(4). These criteria mirror the statutory criteria in R.C. 4903.221(B) that above TCF has already demonstrated it satisfies.

The Adm. Code 4901-1-11(B)(5) states that the Commission shall consider the “extent to which the person’s interest is represented by existing parties.” TCF satisfies this criterion because TCF uniquely represents the interests of all constituencies – spanning the full spectrum of individual citizens, households, institutions and businesses, both customers of FirstEnergy EDUs and those that are not customers – in the Greater Cleveland area. That interest is different from, and not represented by, any other entity in Ohio.

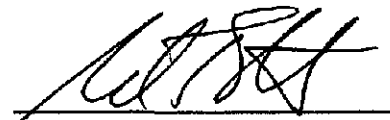
TCF thus meets the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11. On behalf of all citizens, businesses and institutions in the Greater Cleveland area, the Commission should grant TCF’s Motion to Intervene.

### III. CONCLUSION

TCF satisfies the criteria set forth in R.C. 4903.221 and the Commission's rules for intervention. Therefore, TCF respectfully requests that the Commission grant TCF's Motion to Intervene. TCF's participation in this case will contribute to a just resolution of the serious issues involved in this proceeding and will not cause undue delay.

Respectfully submitted,

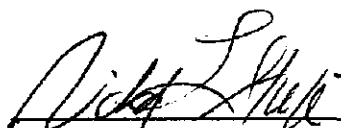
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing The Cleveland Foundation's Motion to Intervene has been served upon the below-stated counsel via regular U.S. Mail, postage prepaid, this 3<sup>rd</sup> day of August, 2007

  
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