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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company and The Toledo )  
Edison Company for Application 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

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**MOTION TO INTERVENE  
OF  
OHIO MANUFACTURERS' ASSOCIATION**

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The Ohio Manufacturers' Association ("OMA") hereby moves to intervene in the above-captioned proceedings pursuant to Ohio Revised Code ("R.C.") Section 4903.221, and Ohio Administrative Code ("OAC") Rule 4901-1-11. As set forth in the Memorandum in Support, OMA submits that it has a real and substantial interest in these proceedings, that it is so situated that the disposition of these proceedings without OMA's participation may impair or impede its ability to protect that interest, and that its participation in these proceedings will contribute to a just result. OMA further submits that its interest in this proceeding is not represented by any existing party and that granting its motion to intervene will not unduly delay these proceedings or unjustly prejudice any existing party.

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**MEMORANDUM IN SUPPORT**

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OMA is the only statewide association exclusively serving manufacturers. It has more than 2,400 Ohio manufacturing companies as members. OMA's member companies consume medium to large amounts of electrical energy and must rely on their host electric distribution utilities, such as The Cleveland Electric Illuminating Company ("CEI"), The Toledo Edison Company ("TE") and Ohio Edison Company ("OE") (collectively "FirstEnergy"), to deliver the electric power necessary in their operations.

On July 10, 2007, FirstEnergy filed its application for a competitive bidding process and for standard service offer for its electric generation supply, and for authority to modify its accounting associated with reconciliation mechanism along with a phase in, and tariffs for generation service. -- This application will have a direct and significant impact on the membership of the OMA.

Consistent with the requirements of R.C. Section 4903.221, and OAC Rule 4901-1-11(B), OMA is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding or prejudice any existing party. OMA submits that its interest is not adequately represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns raised in this proceeding; and that its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party.

WHEREFORE, the Ohio Manufacturers' Association respectfully requests that its motion to intervene be granted.

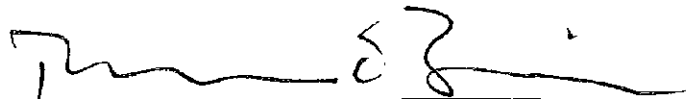
Respectfully submitted on behalf of  
THE OHIO MANUFACTURERS' ASSOCIATION

A handwritten signature in black ink, appearing to read 'T. O'Brien', is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record indicated on the attached service list this 27<sup>th</sup> day of August 2007, *via* U.S. mail, postage prepaid.



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