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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	Case No. 07-551-EL-AIR
Illuminating Company, and The Toledo Edison)	Case No. 07-552-EL-ATA
Company for the Authority to Increase Rates)	Case No. 07-553-EL-AAM
for Distribution Service, Modify Certain)	Case No. 07-554-EL-UNC
Accounting Practices and for Tariff Approvals.)	

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

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 this proceeding, that it is so situated that the disposition of this proceeding without OMA's participation may impair or impede its ability to protect that interest, and that its participation in this proceeding 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.

MEMORANDUM IN SUPPORT

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

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medium to large amounts of electrical energy and must rely on their host electric distribution utilities, The Cleveland Electric Illuminating Company ("CEI"), Toledo Edison Company ("TE") and Ohio Edison Company ("OE") (CEI, TE and OE collectively called "FirstEnergy"), to deliver the electric power necessary in their operations.

On June 7, 2007, and as updated on August 6, 2007, FirstEnergy filed an application increase its distribution rates for electric service. The application filed by FirstEnergy, if granted by the Commission, will significantly impact the price paid by OMA member companies for electricity services.

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 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.

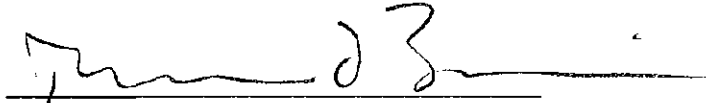
Respectfully submitted on behalf of
THE OHIO MANUFACTURERS' ASSOCIATION



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CERTIFICATE OF SERVICE

I hereby certify that a copy of this MOTION TO INTERVENE is being served by first class mail to the parties listed below, this 28th day of August 2007.



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