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September 14, 2007

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

**In re: Case No 07-1003-EL-ATA and Case No. 2007-1004-EL-AAM**

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of PETITIOIN TO INTERVENE OF THE OHIO ENERGY GROUP to be 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.

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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 5<sup>th</sup> day of September, 2007 to the following:

Firstenergy Service Company  
Burk James W  
76 S Main St  
Akron Oh 44308

Samuel C. Randazzo, General Counsel  
Clark, Joseph M Attorney At Law  
Mcneese Wallace & Nurick LLC  
21 East State Street 17th Floor  
Columbus Oh 43215



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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 : Case Nos. 07-1003-EL-ATA  
Company And The Toledo Edison Company for : 07-1004-EL-AAM  
Authority to Modify Certain Accounting Practices :  
and for Tariff Approvals**

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**THE OHIO ENERGY GROUP'S  
MOTION FOR LEAVE TO INTERVENE**

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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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September 14, 2007

**COUNSEL FOR OHIO ENERGY GROUP**

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

<b>In The Matter Of The Application Of Ohio Edison</b>	<b>:</b>	
<b>Company The Cleveland Electric Illuminating</b>	<b>:</b>	<b>Case Nos. 07-1003-EL-ATA</b>
<b>Company And The Toledo Edison Company for</b>	<b>:</b>	<b>07-1004-EL-AAM</b>
<b>Authority to Modify Certain Accounting Practices</b>	<b>:</b>	
<b>and for Tariff Approvals</b>		

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

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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, ArcelorMittal, BP Products North America, Brush Wellman Inc., DaimlerChrysler Corp., Ford Motor Company, 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.

**BOEHM, KURTZ & LOWRY**

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**COUNSEL FOR THE OHIO ENERGY GROUP**

September 14, 2007