

**FAX****FILE**RECEIVED-DOCKETING DIV  
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PUCO**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 )	Case No. 07-551-EL-AIR
Edison Company for Authority to )	Case No. 07-552-EL-ATA
Increase Rates for Distribution Service, )	Case No. 07-553-EL-AAM
Modify Certain Accounting Practices )	Case No. 07-554-EL-UNC
And for Tariff Approvals )	

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**MOTION TO INTERVENE ON BEHALF OF THE  
NEIGHBORHOOD ENVIRONMENTAL COALITION  
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,  
AND  
THE CONSUMERS FOR FAIR UTILITY RATES  
AND MEMORANDUM IN SUPPORT**

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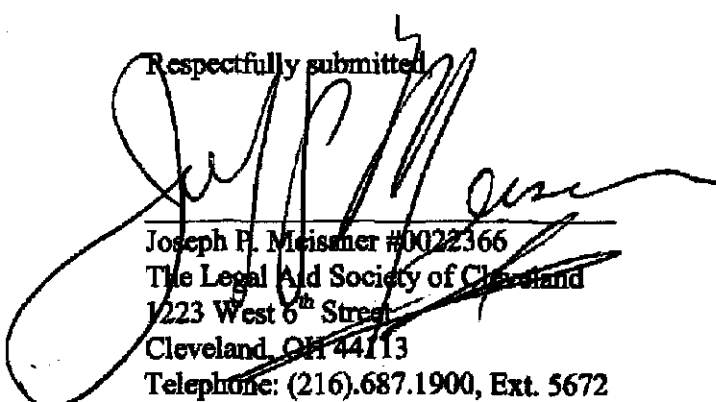
Now comes The Neighborhood Environmental Coalition (hereinafter "Coalition"), The Consumers for Fair Utility Rates (hereinafter "Consumers"), and The Empowerment Center of Greater Cleveland (hereinafter "Center") who, through their counsel, hereby Move to Intervene in the above-captioned matters pursuant to Ohio Law, The Rules and Regulations pertaining to the Public Utilities Commission of Ohio, and the relevant case law. All three of the interveners are hereinafter referred to as "The Citizens Coalition."

The Citizens Coalition specifically seeks the full powers and rights granted by the Commission specifically, by statute and by the provisions of the Ohio Administrative Code to intervening parties.

The reasons for granting this Motion are contained in the Memorandum in Support attached hereto and hereby incorporated herein.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business  
Technician BMC Date Processed 12/21/07

Respectfully submitted,



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Greater Cleveland

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**MEMORANDUM IN SUPPORT OF  
MOTION TO INTERVENE ON BEHALF OF THE  
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Coalition, Consumers, and Center should be permitted to intervene in these matters pursuant to CivR.24 and Rule 4901-1-11 OHIO ADMINISTRATIVE CODE. All three groups specifically meet the criteria for intervention pursuant to OAC 4901-1-11(A)(2) and (B).

In support of its Motion to Intervene, the Citizens Coalition notes that they are citizens groups whose members and supporters are seriously affected by the PUCO's decisions. Given the gravity of the current economic situation of the Greater Cleveland area and the adverse consequences any increases in electric rates could have on poor as well as moderate income families, it is incumbent upon the PUCO to grant all three parties intervention in this matter.

The Coalition's distinguished history of serving low-income families warrants its involvement in this case. Coalition has been in existence for over twenty-five years, working especially in neighborhoods surrounding the industrial valley of Cuyahoga County. It is dedicated

"to protecting the created environment." It is committed to helping low income families meet their energy and heating needs in ways that will not harm the environment.

The Coalition and other two interveners are concerned with the proposals of the companies which could lead to rate increases for customers. The Coalition believes that the commission should take actions that are in the best interest of the citizens of Ohio and in order to do so it should avail itself of information and input from as many sources as possible, including from these interveners..

In reaching any decision regarding rates and a justification for those rates the commission should have the most accurate information available to it and it should be presented in the clearest possible manner to the reviewers. The impact of the results of the commission's decisions upon all customers and especially the low and moderate income customers of the company is important.

Consumers, whose predecessor was Low Income People Together, has also been involved in rate cases for many years. It also has specific concerns about the Companies in this case.

Center is comprised of low-income families who have intervened in matters before the PUCO since 1971. The Center has a history of contributing beneficially to decisions and outcomes that have been rendered by the PUCO. The Center is quite concerned about the present plight of low-income families who are burdened with already high electric rates. The Center urges the PUCO to reduce the current electric rates, rather than raise them.

The foremost reason that has motivated Coalition, Consumers and Center to seek intervention in this matter is their commitment to helping low and moderate income families. Coalition, Consumers and Center are the only parties in this matter that are exclusively devoted to representing the low income segment of the population. Coalition, Consumers and Center are concerned with the fairness, reasonableness, legality, and justice of the various proposals of these utility companies..

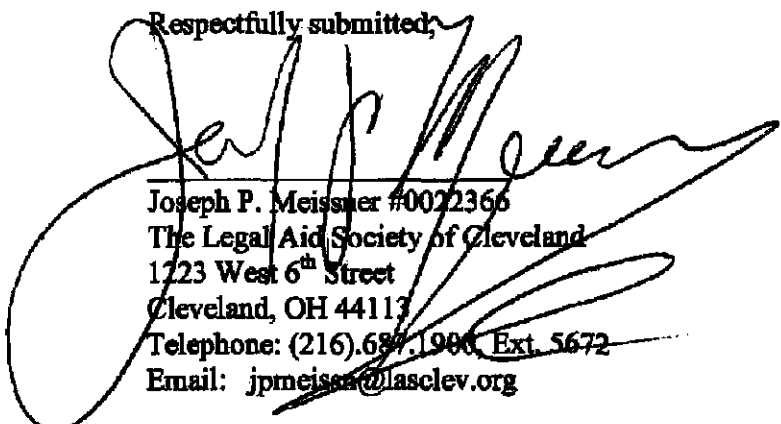
Coalition, Consumers and Center must be heard in this matter in order to protect the interest of low income families and individuals. They have real and substantial interests in this proceeding by virtue of the direct impact changes in rates determined through this case will have on their members located in the service territories of the relevant utility companies. Further, these companies have appeared in past PUCO cases and they have been recognized by the Commission in the past as an advocate for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this case. For the above reasons, these interveners have a direct, real and substantial interest in this proceeding.

The rules of the Ohio Administrative Code were established to provide the commission with best information needed to make decisions which are in the best interest of the citizens of Ohio.

Coalition, Consumers, and Center (The Citizens Coalition) will follow all the administrative rulings in this proceeding and their intervention will not unreasonably delay these proceedings. Nor will their intervention unduly burden any other parties in this proceeding, or the Commission itself.

Wherefore, Coalition, Consumers, and Center (The Citizens Coalition) respectfully request that based on this Motion to Intervene, Coalition, Consumers and Center be recognized as a parties in this case.

Respectfully submitted,



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The Empowerment Center of  
Greater Cleveland

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene, Memorandum in Support, and Certificate of Service were served by regular U.S. Mail, postage prepaid, upon the parties of record identified below on this 21<sup>st</sup> day of December 2007.



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