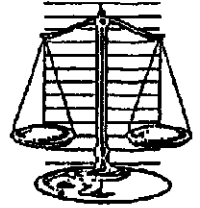




CITY OF PARMA OHIO

LAW DEPARTMENT



6611 RIDGE ROAD

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440-885-8132

Timothy G. Dobeck

Law Director

Prosecutor

March 3, 2009

Public Utilities Commission of Ohio
Attn: Docketing Division
180 East Broad Street, 3rd Floor
Columbus, OH 43215

PUCO

2009 MAR -4 AM 10:25

RECEIVED-DOCKETING DIV

RE: **Case No. 08-935-EL-SSO**
Case No. 09-21-EL-ATA
Case No. 09-22-EL-AEM
Case No. 09-23-EL-AAM

Dear Docketing Clerk:

Enclosed please find one original and twenty (20) copies of the following:

- 1) Motion to Intervene on Behalf of the City of Parma; and
- 2) RE: Letter in Support of Supplemental Stipulation

These filings were faxed to the Docketing Clerk this date.

Sincerely,

Timothy G. Dobeck
Law Director

TGD/bjw
Enclosures

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 J Date Processed - MAR 04 2009

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 Authority to Establish a
Standard Service Offer Pursuant to
R.C. § 4928.143 In the Form of an
Electric Security Plan

Case No. 08-935-EL-SSO

In the Matter of the Application of
Ohio Edison Company, The
Cleveland Electric Illuminating
Company and The Toledo Edison
Company for Approval of Rider FUEL
and Related Accounting Authority

Case No. 09-21-EL-ATA

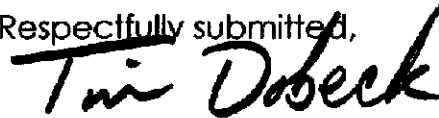
Case No. 09-22-EL-AEM

Case No. 09-23-EL-AAM

MOTION TO INTERVENE ON BEHALF OF THE CITY OF PARMA

The City of Parma ("Parma"), by and through its Mayor Dean DePiero and Law Director Timothy G. Dobeck, respectfully moves the Public Utilities Commission of Ohio pursuant to R.C. § 4903.221 and O.A.C. § 4901-1-11 to grant its intervention in these proceedings for the reasons set forth in the following Memorandum in Support.

Respectfully submitted,



TIMOTHY G. DOBECK (0034699)

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**ATTORNEY FOR INTERVENOR
CITY OF PARMA**

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MEMORANDUM IN SUPPORT

On July 31, 2008 the Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, the "Companies") filed an application for a standard service offer pursuant to R.C. § 4928.141. The application was for an electric security plan in accordance with R.C. § 4928.143. The outcome of this proceeding together with the Companies' Rider Fuel filing in Case Nos. 09-21-EL-ATA, et.al. will have a real and substantial impact on Parma and its citizens and no other party is uniquely positioned to represent the interest of Parma or its citizens in this proceeding.

For purposes of considering request for leave to intervene, O.A.C. § 4901-1-11(A) provides that:

Upon timely motion, any person shall be permitted to intervene in a proceeding upon a showing that: . . . (2) The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.

Further, R.C. § 4903.221(B) provides that the Commission, in ruling upon applications to intervene in its proceedings, shall consider the following criteria:

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

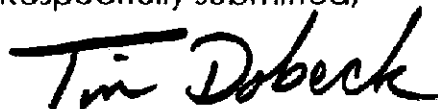
proceedings; (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

OAC 4901-1-11(B) also provides the following factors in considering requests to intervene:

- (1) The nature of the person's interest; (2) The extent to which the person's interest is represented by existing parties; (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice any existing party.

Parma seeks to intervene and participate in this matter to represent the perspective of Parma's citizens relative to all issues that may arise. Parma is willing to accept the record as it exists as of the date this intervention is granted. To the extent that it is appropriate and efficient, Parma intends to coordinate its participation with that of other interested groups. Parma intends to participate fully in the remainder of these proceedings with a focus on protecting the interests of its residents and businesses located in Parma. Parma's participation would contribute to a proper and just resolution of these issues involved without imposing any unnecessary delay or prejudice against another party. For these reasons, Parma requests that its Motion to Intervene be granted.

Respectfully submitted,



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**ATTORNEY FOR INTERVENOR
CITY OF PARMA**

CERTIFICATE OF SERVICE

This is to certify that the foregoing Motion to Intervene on Behalf of the City of Parma has been served upon all of the parties of record in Case No. 08-935-EL-SSO by electronic mail this 3rd day of March, 2009.



TIMOTHY G. DOBECK

Law Director

**Case 08-935-EL-SSO
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