

FILE

**BEFORE
THE PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company, and The Toledo Edison Company for)
Approval of a Market Rate Offer to Conduct a)
Competitive Bidding Process for Standard Service)
Offer Electric Generation supply, Accounting)
Modifications Associated with Reconciliation)
Mechanism, and Tariffs for Generation Service.)

Case No. 09-906-EL-SSO

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**THE OHIO MANUFACTURERS' ASSOCIATION'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Revised Code ("O.R.") Section 4903.221 and Ohio Administrative Code ("OAC") Rule 4901-1-11, the Ohio Manufacturers' Association ("OMA") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("PUCO") should grant the OMA leave to intervene because the OMA has a real and substantial interest in the proceeding, and the PUCO's disposition of this proceeding may impair or impede the OMA's ability to protect that interest.

MEMORANDUM IN SUPPORT

The Ohio Manufacture's Association ("OMA") should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests. OMA was actively involved in the legislative process that resulted in enactment of Senate Bill 221, and was granted

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intervention in the prior standard service offering (“SSO”) proceeding filed by Ohio Edison Company, Cleveland Electric Illuminating Company and Toledo Edison Company (collectively “FirstEnergy”). OMA is the only statewide association exclusively serving manufacturers. It has more than 1,600 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 of FirstEnergy, to deliver the electric power necessary in their operations.

OMA is concerned that the ultimate resolution of the matters to be addressed in the above-captioned proceedings could have a substantial effect on the electricity costs of OMA members, including those OMA members in the service area of FirstEnergy.

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.

OMA has a substantial interest in these proceeding that is not adequately addressed by any other party. OMA’s participation will enhance the effectiveness of the above proceedings, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

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

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 30th day of October 2009 *via* first class mail.


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