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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	:	
Ohio Edison Company, The Cleveland	:	
Electric Illuminating Company, and	:	Case No. 09-1004-EL-EEC
The Toledo Edison Company to	:	Case No. 09-1005-EL-EEC
Amend Their Energy Efficiency	:	Case No. 09-1006-EL-EEC
Benchmarks	:	

MOTION TO INTERVENE

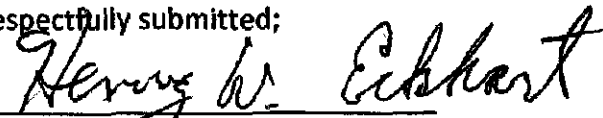
BY

THE SIERRA CLUB OF OHIO

The Sierra Club of Ohio ("Sierra Club") moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in the above styled cases pursuant to Sec. 4903.221 Revised Code of Ohio, and Rule 4901-1-11, of the Ohio Administrative Code, with full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

The Sierra Club provides the following Memorandum In Support of the foregoing Motion.

Respectfully submitted;



Henry W. Eckhart  
 Attorney for The Sierra Club of Ohio  
 50 West Broad Street #2117  
 Columbus Ohio 43215  
 Phone: (614) 461-0984  
 Fax: (614) 221-7401  
 E-mail: [henryeckhart@aol.com](mailto:henryeckhart@aol.com)

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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene, The Sierra Club states that it is the world's oldest and largest grassroots environmental organization. It has 1.4 million members and supporters in 65 Chapters and over 400 local groups nationwide.

The Sierra Club statement of purpose is "To explore, enjoy and protect the wild places of the Earth, to practice and promote the responsible use of the Earth's ecosystem and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives." The Sierra Club had been involved in promotion of responsible energy policy almost since its first year.

The Ohio Chapter has over 17,000 members throughout the state. Global Warming is the Sierra Club's highest priority issue. The Ohio Chapter has been actively promoting energy efficiency as the lowest cost most environmentally accepted resource since 1984.

The Ohio Chapter has been involve in approximately 25 separate cases before the Commission during the 1990's involving 4 of the 7 major IOU's in Ohio. The Ohio Chapter was a key proponent of the energy efficiency measures in Sub. S. B. 221.

Many of The Sierra Club's Ohio members are served by the FirstEnergy companies that are parties to this case. The Sierra Club has a real and substantial interest as these proceedings may directly or indirectly impact the environment of the State of Ohio, and even other areas of the United States.


The intervention of The Sierra Club will not unduly prolong or delay the proceedings.

The intervention of The Sierra Club will significantly contribute to full development of the record in the case.

The particular interest of The Sierra Club regarding the environmental issues will not be fully represented by other existing parties.

WHEREFORE, the Sierra Club of Ohio respectfully requests that its Motion to Intervene be granted in full as aforesaid.

Respectfully submitted

  
Henry W. Eckhart (0020202)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing Motion and Memorandum on the following counsel, by ordinary first class mail, postage prepaid, and/or by electronic mail, this 23<sup>rd</sup> day of November 2009.

Kathy J. Kolich (Counsel of Record)  
Arthur E. Korkosz  
FIRSTENERGY SERVICE COMPANY  
76 South Main Street  
Akron OH 44308

James F. Lang  
CALFEE, HALTER & Griswold LLP  
1400 KeyBank Center  
800 Superior Avenue  
Cleveland OH 44114

Michael E. Heintz  
Environmental Law & Policy Center  
1207 Grandview Avenue  
Columbus OH 43212

David C. Rinebolt  
OPAE  
231 West Lima Avenue PO Box 1793  
Findlay OH 45839-1793

Theodore S. Robinson  
Citizen Power  
2121 Murray Avenue  
Pittsburgh PA 15217

Gregory J. Poulos  
Ohio Consumers' Counsel  
10 West Broad Street, #1800  
Columbus OH 43215-3485

Will Reisinger  
Ohio Environmental Council  
1207 Grandview Avenue, #201  
Columbus OH 43212-3449

  
Henry W. Eckhart, Counsel of Record