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December 17, 2009

Public Utilities Commission of Ohio
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Re: Case No. 09-906-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 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.*

Dear Sir/Madam:

Please find enclosed an original and 21 copies of the Citizens Coalition's Reply Brief in Support of Motion to Intervene and Brief in Support. We have enclosed a self-addressed, postage-paid envelope. Please send a time-stamped copy back to us.

A copy of this was also sent via facsimile to PUCO Docketing. Copies have been served on all parties on the attached certificate of service.

Thank you for your assistance.

Respectfully yours,

Matthew D. Vincel
Attorney at Law

Enc.

cc: Parties of Record

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Technician PR Date Processed 12/18/09

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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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

**REPLY BRIEF OF THE CITIZENS COALITION IN SUPPORT OF MOTION TO
INTERVENE**

In addition to those points raised by the Ohio Consumers' Counsel in its reply to the FirstEnergy memorandum contra motion to intervene, The Neighborhood Environmental Coalition, The Empowerment Center of Greater Cleveland, United Clevelanders Against Poverty, Cleveland Housing Network and The Consumers for Fair Utility Rates (collectively "Citizens Coalition") wishes to make the following points in reply:

1. It is not the intention of the Citizens Coalition to delay proceedings in this case in any manner. The Citizens Coalition does not intend to put on any witnesses or revisit any fact currently in the record of this case, making additional depositions an unnecessary consideration.

2. The Citizens' Coalition has substantial experience with participating in cases of this kind and its experience would help, not hinder a speedy and effective resolution of this case
3. The Citizens Coalition wishes have the opportunity to represent the interests of its member groups in this case, to share the possible results any possible outcome of this case could have on those who are on the economic fringe of FirstEnergy's Customer Base.

The Citizens Coalition respectfully requests that the Commission grant its motion to intervene in this matter.

Respectfully submitted,



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NOTICE OF SERVICE

I hereby certify that a copy of the foregoing Motion and Memorandum were served upon the address of the parties in this PUCO proceeding listed below by ordinary first class mail, postage prepaid, on this 9th day of December 2009.

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