

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Energy Efficiency)	Docket No. 10-227-EL-EEC
& Peak Demand Reduction Program)	Docket No. 10-228-EL-EEC
Portfolio Status Report)	Docket No. 10-229-EL-EEC

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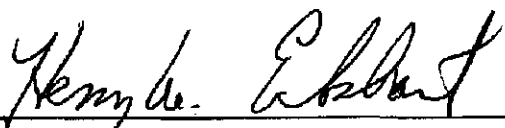
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MOTION TO INTERVENE
BY
THE NATURAL RESOURCES DEFENSE COUNCIL

The Natural Resources Defense Council ("NRDC") 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 NRDC provides the following Memorandum In support of the foregoing Motion.


Henry W. Eckhart, Counsel of Record (0020202)

Attorney for The Natural Resources Defense Council

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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene The Natural Resources Defense Council ("NRDC") states that it is a non-profit environmental organization with over 30 years experience working on state energy policy, including utility regulation and energy efficiency. NRDC has a strong interest in ensuring that Ohio adopts environmentally sound and sustainable energy policies.

NRDC and its 12,600 members who live in Ohio are interested in the Company's compliance with the energy efficient and peak demand requirements of R. C. Sec. 4928.66.

NRDC will bring significant expertise to bear in these proceedings. The Staff of NRDC have extensive history with the design and implementation of utilities' programs and policies designed to deploy energy efficiency and renewable energy technologies to benefit the public.

NRDC has intervened and/or provided testimony on these issues in similar proceedings in a number of states including Illinois, Wisconsin, New York, Oregon, California, New Jersey, and Iowa, to name a few. NRDC has also been granted intervention in numerous cases before the Public Utilities Commission of Ohio.

NRDC has regularly presented testimony before the U. S. Congress and various state legislatures related to the electric utility industry use of energy efficiency and renewable energy resources, utility rate design, utility planning and other topics relevant to this proceeding.

Many of the Ohio NRDC members are served by the electric companies that are the Applicants in these cases. The NRDC has a real and substantial interest in these proceedings as they may directly or indirectly impact the environment of the State of Ohio, and other areas of the United States, and the electric bills of its members in the Applicant's service area.

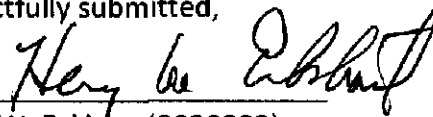
Intervention of NRDC will not unduly prolong or delay the proceeding.

Intervention of NRDC will significantly contribute to the full development of the record in this proceeding.

NRDC's particular interest in regard to energy efficiency and peak demand reduction requirements will not be represented by any other party.

WHEREFORE, The Natural Resources Defense Council respectfully requests that its Motion to Intervene be granted in full as aforesaid.

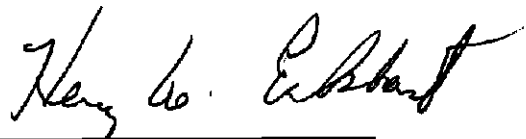
Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served a copy of the foregoing Motion To Intervene on Kathy J. Kolich, counsel of record for FirstEnergy Service Company at 76 South Main Street, Akron, Ohio 44308, and Ebony L. Miller, by electronic transfer at kjkolich@firstenergycorp.com, and elmiller@firstenergycorp.com, respectively, this 7th day of April, 2010.



Henry W. Eckhart