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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of Aligning Electric)
Distribution Utility Rate Structure With)
Ohio's Public Policies to Promote)
Competition, Energy Efficiency, and)
Distributed Generation.)

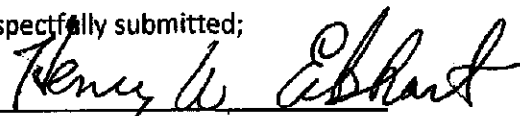
Case No. 10-3126-EL-UNC

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 case 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;



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MEMORANDUM IN SUPPORT OF MOTION

In support of this Motion to Intervene, 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.

Sierra Clubs' 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." Sierra Club had been involved in promotion of responsible energy policy almost since its first year.

The Ohio Chapter of the Sierra Club has over 17,000 members throughout the state. Global Warming is 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 involved in approximately 25 separate cases before the Commission involving most of the major IOU's in Ohio. The Ohio Chapter was a key proponent of the energy efficiency measures in Ohio Sub. S.B. 221.

The Sierra Club has a real and substantial interest as these proceeding may directly or indirectly impact the environment of the State of Ohio, and even other areas of the United States.

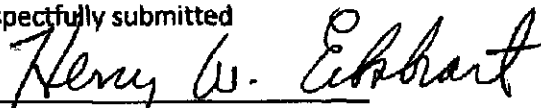
Intervention of the Sierra Club will not unduly prolong or delay the proceedings.

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

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

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

Respectfully submitted


Henry W. Eckhart, Counsel of Record
for the Sierra Club

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CERTIFICATE OF SERVICE


The undersigned hereby certifies that a true copy of the foregoing Motion and Memorandum has been served upon the following parties by electronic mail this 2nd day of February, 2011.

2011.

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