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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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

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MOTION TO INTERVENE  
AND NOTICE REGARDING INITIAL COMMENTS OF  
THE OHIO MANUFACTURERS' ASSOCIATION

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


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MEMORANDUM IN SUPPORT

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On December 28, 2010, the Commission opened this docket for the purpose of exploring issues relating to rate design in the electric industry; in particular, the issue of revenue decoupling. The members of OMA will be affected by the Commission's determination in this matter and should be permitted to intervene in the above-captioned proceeding.


OMA is the only statewide association exclusively serving manufacturers, and has more than 1,600 Ohio manufacturing companies as members. OMA's member companies consume significant amounts of electrical energy in the State of Ohio.

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Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMA submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. OMA's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership. Accordingly, OMA respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

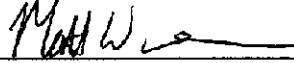
Pursuant to the Attorney Examiner's Entry dated December 29, 2010 ("Entry"), the OMA hereby files notice that it will not be filing initial comments in response to the questions set forth in Appendix A of the Entry. Nonetheless, the OMA reserves its right to file reply comments.

Respectfully submitted on behalf of  
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 11<sup>th</sup> day of February 2011 via first class mail.



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