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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the Ohio)
Department of Development for an Order)
Approving Adjustments to the Universal)
Service Fund Riders of Jurisdictional Ohio)
Electric Distribution Utilities.)

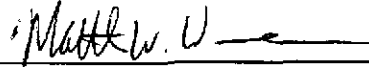
Case No. 11-3223-EL-USF

MOTION TO INTERVENE OF THE OMA ENERGY GROUP

Pursuant to Section 4903.221, Revised Code ("RC"), and Rule 4901-1-19, Ohio Administrative Code ("OAC"), the OMA Energy Group ("OMAEG") hereby respectfully moves for leave to intervene in the above-captioned proceeding. The Public Utilities Commission of Ohio ("Commission") should grant the motion to intervene because the OMAEG has a real and substantial interest in this proceeding, and the Commission's disposition of this proceeding may impair or impede the OMAEG's ability to protect that interest. OMAEG believes that its participation will not unduly prolong or delay this proceeding and that OMAEG will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, OMAEG's interests will not be adequately represented by other parties to this proceeding. Accordingly, for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, OMAEG respectfully requests that the Commission grant this Motion to Intervene.

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Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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THE PUBLIC UTILITIES COMMISSION OF OHIO**

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MEMORANDUM IN SUPPORT

On May 31, 2011, the Ohio Department of Development ("ODOD") filed its application for approval of adjustments to the universal service fund ("USF") riders of all jurisdictional Ohio electric distribution utilities ("Application"). In its Application, the ODOD states that it will propose to recover the annual USF rider revenue requirement for each electric distribution utility ("EDU") through a USF rider that incorporates a two-step, declining block rate design of the type approved by the Public Utilities Commission of Ohio ("Commission") in prior ODOD USF rider adjustment proceedings. (Application at 14).

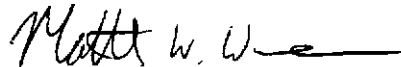
The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating in critical cases before the Commission. The OMAEG's members are all members of the Ohio Manufacturers' Association. The OMAEG members purchase electric power services from Ohio EDUs, support low income programs through payment of the USF riders, and will be affected by the

Commission's determination in this matter. Accordingly, the OMAEG should be permitted to intervene in the above-captioned proceeding.

Consistent with the requirements of Section 4903.221, R.C., and Rule 4901-1-11, OAC, the OMAEG is a real party in interest herein, whose interest is not now represented, who can make a contribution to this proceeding and who will not unduly delay this proceeding or prejudice any existing party. The OMAEG submits that its interest is not represented by existing parties; that it will contribute to the just and expeditious resolution of the issues and concerns set forth in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above-captioned proceeding, and ensure that the proceeding is fair to its membership.

WHEREFORE, the OMAEG respectfully requests that its motion to intervene in the above-captioned proceeding be granted.

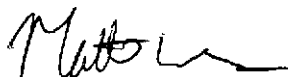
Respectfully submitted on behalf of
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene and Memorandum in Support was served upon the parties of record listed below this 30th day of June 2011 *via* first class mail.



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