

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of The Review of The Alternative	)	
Energy Rider Contained in the Tariffs of Ohio Edison	)	
Company, The Cleveland Electric Illuminating	)	Case No. 11-5201-EL-RDR
Company, and The Toledo Edison Company.	)	

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**MOTION TO INTERVENE OF  
THE MID-ATLANTIC RENEWABLE ENERGY COALITION**

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Pursuant to Ohio Revised Code Section (“R.C.”) 4903.221 and Ohio Administrative Code (O.A.C.) Rule 4901-1-12(C), the Mid-Atlantic Renewable Energy Coalition (“MAREC”) 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 MAREC has a real and substantial interest in this proceeding, and the Commission’s disposition of this proceeding may impair or impede MAREC’s ability to protect that interest. MAREC believes that its participation will not unduly prolong or delay this proceeding and that MAREC will significantly contribute to the full development and equitable resolution of the issues in this proceeding. Additionally, MAREC’s interests will not be adequately represented by other parties to this proceeding. Accordingly, and for these reasons and as set forth in the Memorandum in Support attached hereto and incorporated herein, MAREC respectfully requests that the Commission grant this Motion to Intervene.

Respectfully submitted on behalf of the  
MID-ATLANTIC RENEWABLE ENERGY  
COALITION

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**MEMORANDUM IN SUPPORT**

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On September 20, 2011, the Commission opened a docket to review the Alternative Energy Rider of Ohio Edison Company (“OE”), The Cleveland Electric Illuminating Company (“CEI”), and the Toledo Edison Company (“TE”, collectively, “FirstEnergy”) and specifically whether and how the statutory cost cap for renewable energy should be applied. MAREC will be impacted by the Commission’s decision relating to the Alternative Energy Rider, and MAREC should be permitted to intervene in the above-captioned proceeding.

MAREC is a coalition of diverse wind developers, turbine manufacturers, and public interest organizations formed to educate policy makers and the general public about renewable energy issues in the PJM territory. MAREC also collaborates with other renewable energy industry partners. MAREC’s mission is to ensure that wind power establishes itself as one of the region’s leading energy resources, providing substantial environmental and economic benefits. MAREC serves as a platform for providing quality information, expertise, analysis and data about wind energy. MAREC is concerned about the impact that the calculation of the state renewable portfolio standard’s statutory cost cap may have on the development of wind and other renewable energy in the State of Ohio because many of its members are actively developing Ohio projects.

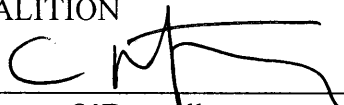
MAREC should be permitted to intervene in the above-captioned proceeding because it has real and substantial interests. MAREC is concerned that the ultimate resolution of the matters to be addressed in this proceeding could have a substantial effect on the potential benefits of the widespread deployment of wind energy throughout the state and the region.

Consistent with the requirements of R.C. Section 4903.221, and OAC Rule 4901-1-11(B), MAREC is a real party in interest herein, whose interest is not now represented, who can make a contribution to the proceeding and will not unduly delay the proceeding or prejudice any existing party. MAREC 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 that are set forth in these proceedings; and that its participation in these proceedings will not cause undue delay or unjustly prejudice any existing party.

MAREC has a substantial interest in these proceedings that is not adequately addressed by any other party. MAREC's participation will enhance the effectiveness of the above proceeding, will not unnecessarily cause delay, and will help ensure that the proceedings in this matter are fair to its membership.

WHEREFORE, MAREC respectfully requests that its motion to intervene be granted.

Respectfully submitted on behalf of the  
MID-ATLANTIC RENEWABLE ENERGY  
COALITION

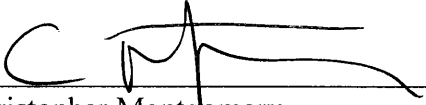


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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 13<sup>th</sup> day of January 2012 *via* first class mail.

  
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Summary: Motion to Intervene electronically filed by Teresa Orahood on behalf of Mid-Atlantic Renewable Energy Coalition