

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of the)
Participation of The Cleveland Electric Illuminating)
Company, the Ohio Edison Company, and The)
Toledo Edison Company in the May 2012)
PJM Reliability Pricing Model Auction.)

Case No. 12-814-EL-UNC

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF INDUSTRIAL ENERGY USERS-OHIO**

Samuel C. Randazzo (Counsel of Record)
Frank P. Darr
Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

March 13, 2012

Attorneys for Industrial Energy Users-Ohio

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of the)	
Participation of The Cleveland Electric Illuminating)	
Company, the Ohio Edison Company, and The)	Case No. 12-814-EL-UNC
Toledo Edison Company in the May 2012)	
PJM Reliability Pricing Model Auction.)	

MOTION TO INTERVENE

Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the Ohio Administrative Code, to intervening parties.

On January 26, 2012, FirstEnergy Corporation ("FirstEnergy") announced that it would be retiring generation facilities located in the American Transmission System Inc. ("ATSI") zone for the PJM Interconnection, LLC ("PJM"). Since the retirement of these facilities could impact the ability to maintain voltage support and result in transmission constraints, the Commission initiated a proceeding on February 29, 2012, to review FirstEnergy's participation in the May 2012 PJM Reliability Pricing Model ("RPM") auction. The Commission, in its February 29 Entry, directed FirstEnergy to consult with the Commission's Staff and file a report detailing potential energy efficiency and peak demand reduction ("EE/PDR") offers into the May 2012 PJM RPM auction for the 2015/2016 year.

As demonstrated further in the Memorandum in Support attached hereto and incorporated herein, IEU-Ohio has a direct, real, and substantial interest in the issues in the above-captioned proceeding, and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. IEU-Ohio believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in the proceeding. The interests of IEU-Ohio will not be adequately represented by other parties to the proceeding and, as such, IEU-Ohio is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the Ohio Administrative Code, to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo (Counsel of Record)

Frank P. Darr

Matthew R. Pritchard

MCNEES WALLACE & NURICK LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

Attorneys for Industrial Energy Users-Ohio

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of the)	
Participation of The Cleveland Electric Illuminating)	
Company, the Ohio Edison Company, and The)	Case No. 12-814-EL-UNC
Toledo Edison Company in the May 2012)	
PJM Reliability Pricing Model Auction.)	

MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, IEU-Ohio states that it is an association of ultimate customers. A current listing of IEU-Ohio member companies is available on IEU-Ohio's website at http://www.ieu-ohio.org/member_list.aspx. IEU-Ohio's members purchase substantial amounts of electric and related services from Ohio's electric distribution utilities ("EDU"), including FirstEnergy's EDUs: The Cleveland Electric Illuminating Company, Ohio Edison Company, and The Toledo Edison Company.

IEU-Ohio's members work together to address matters that affect the availability and price of utility services. Additionally, IEU-Ohio seeks to promote customer-driven policies that will assure an adequate, reliable, and efficient supply of energy for all consumers at competitive prices. To this end, IEU-Ohio has worked, including actively participating in the legislative process related to Amended Substitute Senate Bill 221 ("SB 221"), and will continue to work to produce legislative, regulatory, and market outcomes that are consistent with the State policy contained in Section 4928.02, Revised Code.

IEU-Ohio has a real and substantial interest inasmuch as this proceeding may directly or indirectly impact the provision of electric service to IEU-Ohio members' manufacturing facilities. Specifically, IEU-Ohio's direct interest in this proceeding is the

result of the effect that this proceeding shall have upon the price, adequacy, and reliability of the electric supply and related services within Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo (Counsel of Record)

Frank P. Darr

Matthew R. Pritchard

MCNEES WALLACE & NURICK LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

Attorneys for Industrial Energy Users-Ohio

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Industrial Energy Users-Ohio* was served upon the following parties of record this 13th day of March 2012, *via* hand-delivery, electronic transmission, or first class mail, U.S. postage prepaid.

/s/ Matthew R. Pritchard

MATTHEW R. PRITCHARD

Kathy J. Kolich
Carrie Dunn
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308-1890
kjkolich@firstenergycorp.com
cdunn@firstenergy.com

William Wright
Assistant Attorney General
Chief, Public Utilities Section
180 East Broad Street
Columbus, OH 43215
William.wright@puc.state.oh.us

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
Cmooney2@columbus.rr.com

Lisa G. McAlister
Matthew W. Warnock
J. Thomas Siwo
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
lmcaster@bricker.com
mwarnock@bricker.com
tsiwo@bricker.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/13/2012 2:59:15 PM

in

Case No(s). 12-0814-EL-UNC

Summary: Motion Motion to Intervene of Industrial Energy Users-Ohio electronically filed by Mr. Matthew R. Pritchard on behalf of Industrial Energy Users-Ohio