

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company and The Toledo Edison Company) Case No. 12-1230-EL-SSO
for Authority to Provide a Standard Service)
Offer pursuant to R.C. § 4928.143 in the Form)
of an Electric Security Plan.)

**MOTION TO INTERVENE
ON BEHALF OF THE
NORTHWEST OHIO AGGREGATION COALITION**

The City of Toledo and the Board of Lucas County Commissioners, representing the Northwest Ohio Aggregation Coalition (hereinafter "NOAC"), respectfully move the Public Utilities Commission, pursuant to Section 4903.221 of the Ohio Revised Code and Section 4901-1-11 of the Ohio Administrative Code, to grant intervention in these proceedings for the reasons set forth in the following Memorandum in Support.

Respectfully submitted,

/s/ Leslie A. Kovacik
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Counsel on behalf of NOAC

MEMORANDUM IN SUPPORT

On April 13, 2012 the Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company (collectively "FirstEnergy") filed application for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan ("Application"). The proposed changes to the ESP, and the requested waivers and cost increases will have a real and substantial impact on NOAC and no other party is uniquely positioned to represent NOAC's interests in this proceeding.

The nature and extent of NOAC's interest lies in the fact that it operates aggregation programs and represents 470,000 residents and commercial businesses as the second largest governmental aggregation in the state. The present members of NOAC are: the cities of Toledo, Northwood, Maumee, Oregon, Perrysburg and Sylvania, the unincorporated townships as represented by the Board of Lucas County Commissioners, the villages of Holland and Ottawa Hills, and the townships of Lake and Perrysburg.

NOAC intends to participate fully in these proceedings to further the legal positions most relevant to aggregators, residential users and commercial customers. NOAC's participation would contribute to a proper and just resolution of these issues involved without imposing any unnecessary delay or prejudice against another party. For these reasons, NOAC requests that its Motion to Intervene be granted.

Respectfully submitted,

/s/ Leslie A. Kovacik

Leslie A. Kovacik
Counsel on behalf of NOAC

/s/ Thomas R. Hays

Thomas R. Hays
Counsel on behalf of NOAC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene and Memorandum of Support was served electronically upon the following persons identified below on this 17th day of April 2012.

/s/ Leslie A. Kovacik

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Summary: Motion To Intervene electronically filed by Ms. Leslie A Kovacik on behalf of Kovacik, Leslie A Ms.