

FILE

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PUCO

Chief of Docketing  
The Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215-3793

April 30, 2010

SUBJECT: In Re Case 12-1230-EL-SSO

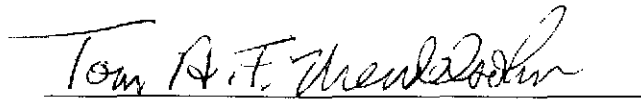
Dear Friends,


We are faxing our Motion to Intervene.. We are also sending the requisite copies and the original by overnight express mail.

We are including an extra copy to be time-stamped and returned to us. We have also enclosed an envelope addressed back to us.

Thank you.

Very truly yours,

  
Tom Mendelsohn  
For Citizens Coalition

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician  Date Processed MAY 01 2012

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BEFORE

**PUCO**  
**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 for Authority to Provide )  
for a Standard Service Offer Pursuant )  
to Section 4928.143, Revised Code, in the )  
Form of an Electric Security Plan )

Case No. 12-1230-EL-SSO

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**MOTION TO INTERVENE  
FILED ON BEHALF OF THE  
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,  
CLEVELAND HOUSING NETWORK.  
AND  
THE CONSUMER PROTECTION ASSOCIATION  
AND MEMORANDUM IN SUPPORT**

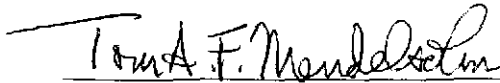
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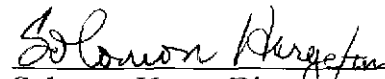
Now comes Cleveland Housing Network ("Network), The Empowerment Center of Greater Cleveland (hereinafter "Center"), The Consumer Protection Association, who through their counsel, hereby Move to Intervene in the above-captioned matters pursuant to Ohio Law, The Rules and Regulations pertaining to the Public Utilities Commission of Ohio, and the relevant case law. All three of the interveners are hereinafter referred to as "The Citizens Coalition."


The Citizens Coalition specifically seeks the full powers and rights granted by the Commission specifically, by statute, and by the provisions of the Ohio Administrative Code to intervening parties.

The reasons for granting this Motion are contained in the Memorandum in Support attached hereto and hereby incorporated herein.

Respectfully submitted,

  
\_\_\_\_\_  
Tom Mendelsohn, Director  
The Empowerment  
Center of Greater Cleveland

  
\_\_\_\_\_  
Solomon Harge, Director  
Consumer protection Association

  
\_\_\_\_\_  
Liz Hernandez, Representative  
Cleveland Housing Network

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Edison Company, The Cleveland Electric	)	
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**MEMORANDUM IN SUPPORT OF  
MOTION TO INTERVENE FILED ON BEHALF OF THE  
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,  
CLEVELAND HOUSING NETWORK.  
AND  
CONSUMERS PROTECTION ASSOCIATION**

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The Empowerment Center of Greater Cleveland, Cleveland Housing Network, and the Consumer Protection Association (the Citizens Coalition) should be permitted to intervene in these matters pursuant to CivR.24 and Rule 4901-1-11 OHIO ADMINISTRATIVE CODE. All three groups specifically meet the criteria for intervention pursuant to OAC 4901-1-11(A)(2) and (B).

In support of their Motion to Intervene, the Citizens Coalition notes that they are citizens groups and agencies whose members, clients, and supporters are seriously affected by the

PUCO's decisions. Given the gravity of the current economic situation of the Greater Cleveland area, the worsening of the economy and employment in our general area, the continuing Great Recession, the ongoing housing crisis with increasing numbers of foreclosures, the immense increases in basic necessities including food, energy, and gasoline, and the adverse consequences any increases in electric rates could have on poor as well as moderate income families, it is incumbent upon the PUCO to grant all three parties intervention in this matter.

Our understanding is that the companies and FE are seeking a two year extension of their present ESP which runs out in 2014. The Citizens Coalition is concerned that any extension is done properly taking into account all of the various sections of the present ESP which particular concern our clients and their members and supporters.

Thus the Citizens Coalition and the low-income families represented by the Coalition have "a real and substantial interest" in the outcome of this current set of cases, as required by OAC 4901-1-11(A). Disposition of these cases without permitting the Citizens Coalition to intervene will impair and impede their ability to protect the interests of this particular group of customers. While other parties to this proceeding may also be concerned about the issues that affect low-income families, they have other sets of customers groups which they also must represent, which may impact their legal assistance to low-income families.

The following provides some background on the groups within the Citizens Coalition and how they bring special and particular perspectives to these proceedings which can be helpful in the PUCO's resolution of the issues.

The Coalition's distinguished history of serving low-income families warrants its involvement in this case. Coalition has been in existence for over thirty years, working especially in neighborhoods surrounding the industrial valley of Cuyahoga County. It is dedicated "to protecting the created environment," which includes all the pollution produced by FE and its companies. The Coalition is committed to helping low income families meet their energy and heating needs in ways that will not harm the environment.

The Citizens Coalition, whose predecessors include Low Income People Together and the Neighborhood Environmental Coalition, have also been involved in PUCO proceedings for many years. It also has specific concerns about the Companies in this case

The Citizens Coalition members have been receiving funds from FE for the Fuel Fund. These need to be continued, and if possible extended in order to help the many families who need such assistance. Coalition members will receive funds from the companies involved in this proceeding, although as has been stated in various past PUCO legality, and justice of the Fuel Rider proposals of these utility companies, especially as these may impact upon the implementation of the new Law in Ohio, S.B. 221.

The Citizens Coalition must be heard in this matter in order to protect their interests of low income families and individuals. They have real and substantial interests in this proceeding by virtue of the direct impact changes in fuel charges and thus rates determined through this case will have on their members, their supporters, and clients located in the service territories of the relevant utility companies. Further, these groups have appeared in past PUCO cases and they have been recognized by the Commission in the past as advocates for consumers and particularly low-income consumers, all of whom will be affected by the outcome of this case. This is the time when these and other consumer groups should especially be welcomed by the PUCO to insure that proper, reasonable, fair, and just precedents are established and that the new law's provisions are properly implemented. These groups will also advocate for adequate energy efficiency, environmental, and renewable energy programs.

The Citizens Coalition will not unduly prolong nor delay the proceedings. In fact, these groups in the past have worked cooperatively with utility companies on efforts to resolve issues expeditiously. The Citizens Coalition has consistently held out the "olive

branch” of negotiation to FE and its companies in an effort to promote a timely and fair resolution of issues.

For the above reasons, these interveners have a direct, real and substantial interest in this proceeding.

The rules of the Ohio Administrative Code were established to provide the commission with best information needed to make decisions which are in the best interest of the citizens of Ohio. The Citizens Coalition will provide the best information they can in order to help the PUCO.

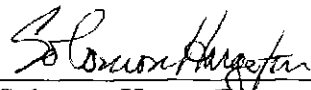
The Citizens Coalition will follow all the administrative rulings in this proceeding and their intervention along with any litigation that is required will not unreasonably delay these proceedings.

The Citizens Coalition respectfully request that based on this Motion to Intervene and this Memorandum in Support, Empowerment Center of Greater Cleveland, Cleveland Housing Network, and Cleveland Housing Network, together known as the “Citizens Coalition,” be recognized as parties in this case.

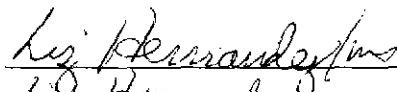
Respectfully submitted,

A handwritten signature in cursive script, reading "Tom A. F. Mendelsohn", written over a horizontal line.

Tom Mendelsohn, Director  
The Empowerment  
Center of Greater Cleveland

A handwritten signature in cursive script, reading "Solomon Harge", written over a horizontal line.

Solomon Harge, Director  
Consumer protection Association .


A handwritten signature in cursive script, reading "Liz Hernandez", written over a horizontal line.

Liz Hernandez  
Cleveland Housing Network



### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene, Memorandum in Support, and Certificate of Service were served by email, upon the parties of record and potential parties by email service on this 30<sup>th</sup> day of April 2012.

  
Tom Mendelsohn