

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Investigation of Ohio's Retail Electric)	Case No. 12-3151-EL-COI
Service Market.)	

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

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

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Attorneys for Industrial Energy Users-Ohio

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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 December 12, 2012, the Public Utilities Commission of Ohio ("PUCO" or "Commission") issued an Entry initiating an investigation regarding the health, strength and vitality of the competitive retail electric service market and actions that the Commission may take to enhance the health, safety and vitality of that market. As part of the investigation, interested parties have an opportunity to respond to numerous questions regarding default service as well as Ohio's corporate separation requirements. Based on the content of the questions, it appears that this investigation may impact the ultimate price paid as well as the size and scope of the "customer choice" opportunity available to IEU-Ohio's many members.

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 and matters involved in this investigation, 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/ Samuel C. Randazzo
Samuel C. Randazzo (Counsel of Record)
Frank P. Darr
Matthew R. Pritchard
Joseph E. Olier
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
joliker@mwncmh.com

Attorneys for Industrial Energy Users-Ohio

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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").

IEU-Ohio's members are commercial and industrial customers that work together to address matters that affect the availability and price of utility services which they need to operate their facilities in Ohio and to successfully compete in the global economy. 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 was actively involved in the legislative process that produced Chapter 4928, Revised Code, in its original and current form as well as the many related regulatory proceedings initiated by the Commission on its own initiative or by other parties.

On December 12, 2012, the Commission issued an Entry initiating an investigation regarding the health, strength and vitality of the competitive retail electric service market and actions that the Commission may take to enhance the health, safety

and vitality of that market. As part of the investigation, interested parties have an opportunity to respond to numerous questions regarding default service as well as Ohio's corporate separation requirements. Based on the content of the questions, it appears that this investigation may impact the ultimate price paid as well as the size and scope the "customer choice" opportunity available to IEU-Ohio's many members.

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/ Samuel C. Randazzo
Samuel C. Randazzo (Counsel of Record)
Frank P. Darr
Matthew R. Pritchard
Joseph E. Olier
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
joliker@mwncmh.com

Attorneys for Industrial Energy Users-Ohio

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Industrial Energy Users-Ohio's Motion to Intervene and Memorandum in Support* was served upon the following parties of record this 1st day of March 2013, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

/s/ Samuel C. Randazzo

Samuel C. Randazzo

Maureen R. Grady, Counsel of Record
Joseph P. Serio
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
grady@occ.state.oh.us
serio@occ.state.oh.us

**ON BEHALF OF THE OFFICE OF THE OHIO
CONSUMERS' COUNSEL**

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215
mhpeticoff@vorys.com
smhoward@vorys.com

David I. Fein
Vice President, State Government Affairs-East
Exelon Corporation
550 West Washington Blvd., Suite 300
Chicago, IL 60661
David.Fein@Constellation.com

Cynthia Fonner Brady
Assistant General Counsel
Exelon Business Services Company
4300 Winfield Road
Warrenville, IL 60555
Cynthia.Brady@Constellation.com

**ON BEHALF OF EXELON GENERATION COMPANY,
LLC AND CONSTELLATION NEWENERGY, INC.**

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
cmooney@ohiopartners.org

**ON BEHALF OF OHIO PARTNERS FOR AFFORDABLE
ENERGY**

Craig G. Goodman
President
Stacey Rantala
Director, Regulatory Services
National Energy Marketers Association
3333 K Street, NW, Suite 110
Washington, DC 20007
cgoodman@energymarketers.com
srantala@energymarketers.com

**ON BEHALF OF NATIONAL ENERGY MARKETERS
ASSOCIATION**

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215
mhpeticoff@vorys.com
smhoward@vorys.com

**ON BEHALF OF RETAIL ENERGY SUPPLY
ASSOCIATION**

Steven T. Nourse
Matthew J. Satterwhite
Yazen Alami
American Electric Power Service
Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
stnourse@aep.com
mjwatterwhite@aep.com
yalami@aep.com

ON BEHALF OF OHIO POWER COMPANY

Glenn S. Krassen
Bricker & Eckler LLP
1001 Lakeside Avenue East, Suite 1350
Cleveland, OH 44114
gkrassen@bricker.com

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

**ON BEHALF OF NORTHEAST OHIO PUBLIC ENERGY
COUNCIL**

William Sundermeyer
Associate State Director, Advocacy
AARP Ohio
17 S. High Street, #800
Columbus OH 43215

ON BEHALF OF AARP

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215
mhpetricoff@vorys.com
smhoward@vorys.com

ON BEHALF OF NRG ENERGY, INC.

Michael R. Smalz
Joseph V. Maskovyak
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 43215-1137
msmalz@ohiopoveritylaw.org
jmaskovyak@ohiopoveritylaw.org

Ellis Jacobs
Edgemont Neighborhood Coalition
c/o Advocates for Basic Legal Equality, Inc.
130 West Second Street, Suite 700 East
Dayton, OH 45402
ejacobs@ablelaw.org

Noel Morgan
Communities United for Action
c/o Legal Aid of Southwest Ohio, LLC
215 East Ninth Street, Suite 500
Cincinnati, OH 45202
nmorgan@lascinti.org

Michael A. Walters
Pro Seniors, Inc.
7162 Reading Road, Suite 1150
Cincinnati, OH 45237
mwalters@proseniors.org

Peggy Lee & Robert Johns
Southeastern Ohio Legal Services
964 East State Street
Athens, OH 45701
plee@oslsa.org
rjohns@oslsa.org

Gary Benjamin
Community Legal Aid Services, Inc.
50 South Main Street, Suite 800
Akron, OH 44308-1828
gbenjamin@communitylegalaid.org

Julie Robie & Anne Reese
The Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, OH 44113
Julie.robie@lasclev.org
Anne.reese@lasclev.org

Joseph P. Meissner
Citizens Coalition
c/o Joseph Patrick Meissner and Associates
5400 Detroit Avenue
Cleveland, OH 44102
meissnerjoseph@yahoo.com

Scott Torguson
Legal Aid Society of Columbus
1108 City Park Avenue
Columbus, OH 43206
storguson@columbuslegalaid.org

ON BEHALF OF LOW INCOME ADVOCATES

William Wright
Chief, Public Utilities Section
Assistant Attorney General
180 E. Broad Street, 6th Floor
Columbus, OH 43215-3793
william.wright@puc.state.oh.us

**ON BEHALF OF THE STAFF OF THE PUBLIC
UTILITIES COMMISSION OF OHIO**

Elizabeth Stevens
Attorney Examiner
Public Utilities Commission of Ohio
180 East Broad Street, 12th Floor
Columbus, OH 43215
Elizabeth.stevens@puc.state.oh.us

ATTORNEY EXAMINER

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