

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Ohio Schools Council, Ohio School Boards Association, Ohio Association of School Business Officials, and Buckeye Association of School Administrators, dba Power4Schools,)	
)	
Complainants,)	Case No. 14-1182-EL-CSS
)	
v.)	
)	
FirstEnergy Solutions Corp.,)	
)	
Respondent.)	

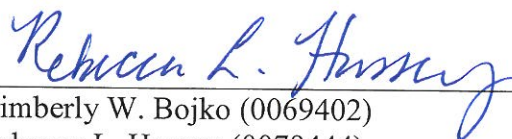
**MOTION TO INTERVENE OF THE
OHIO MANUFACTURERS' ASSOCIATION**

Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, the Ohio Manufacturers' Association (OMA) hereby respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene in the above-captioned matter with the full powers and rights granted to intervening parties.

As further demonstrated in the attached Memorandum in Support, OMA and its members have a real and substantial interest in this proceeding which may be adversely affected by its outcome, and which cannot be adequately represented by any existing parties. Accordingly, OMA satisfies the standard for intervention set forth in the Commission's rules and by statute.

WHEREFORE, OMA respectfully requests that the Commission grant this motion for leave to intervene and that OMA be made a full party of record in this proceeding.

Respectfully submitted,



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Association, Ohio Association of School)	
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MEMORANDUM IN SUPPORT

On July 3, 2014, the Ohio Schools Council, Ohio School Boards Association, Ohio Association of School Business Officials, and Buckeye Association of School Administrators, dba Power4Schools (collectively, Power4Schools), filed a complaint against FirstEnergy Solutions Corp. (FES), asserting, inter alia, that FES improperly assessed, in participating members' June 2014 electric utility bills, additional charges for ancillary services based upon usage during the month of January 2014. Subsequently, several other parties, including The Timken Company, Marathon Petroleum Company, Wausau Paper Towel & Tissue LLC, ASHTA Chemicals Inc., Columbus Castings, The Lincoln Electric Company, Delphi Corporation, Landmark Plastic Corporation, Navco Enterprises.Com, Inc., Navco Enterprises of P.V., Inc., Navco Enterprises, Inc., Foodlife International, Inc., Navco Enterprises of O.V., Inc., and Navco of York Road, Inc., filed motions to intervene in the matter. Section 4903.221,

Revised Code, and Rule 4901-1-11, Ohio Administrative Code (O.A.C.), establish the standard for intervention in the above-captioned proceeding.

Section 4903.221, Revised Code, provides, in pertinent part, that any person “who may be adversely affected” by a Commission proceeding is entitled to seek intervention in that proceeding. Section 4903.221(B), Revised Code, further requires the Commission to consider the nature and extent of the prospective intervenor’s interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor’s potential contribution to a just and expeditious resolution of the issues involved.

Rule 4901-1-11, O.A.C., permits intervention to a party who has a real and substantial interest in the proceeding, who is so situated that the disposition of the proceeding may impair or impede its ability to protect that interest, and whose interest is not adequately represented by an existing party.

The Ohio Manufacturers’ Association (OMA) is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMA works directly with elected officials, regulatory agencies, the judiciary, and the media, to provide education and information to energy consumers, regulatory boards, and suppliers of energy; to advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and to advocate in critical cases before the Commission. Numerous OMA members are also customers who purchase electric generation services from FES, have been improperly assessed (or noticed that they will be assessed for) charges for ancillary services based upon their usage during the month of January 2014, and will be affected by the Commission’s determination in this matter.

Given these circumstances, OMA has a direct, real, and substantial interest in the issues implicated in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect those interests. Moreover, OMA's interests will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

OMA satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, O.A.C., and is, therefore, authorized to intervene with the full powers and rights granted by the Commission to intervening parties.

WHEREFORE, OMAEG respectfully requests that the Commission grant its motion for leave to intervene and designate OMA a full party of record in the above-captioned case.

Respectfully submitted,

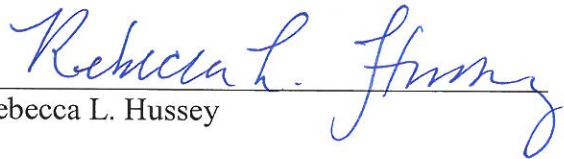


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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on July 29, 2014.


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Summary: Motion to Intervene and Memorandum in Support electronically filed by Ms. Rebecca L Hussey on behalf of Ohio Manufacturers' Association