

**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 for Authority to Provide a Standard	)	Case No. 14-1297-EL-SSO
Service Offer Pursuant R.C. 4925.143 in the	)	
Form of an Electric Security Plan.	)	
	)	

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**MOTION TO INTERVENE OF THE OMAEG**

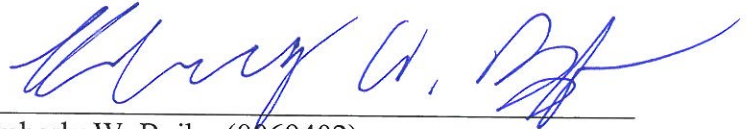
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Pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, The Ohio Manufacturers' Association Energy Group (OMAEG) hereby respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene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

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

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

Respectfully submitted,



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**MEMORANDUM IN SUPPORT**

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On August 4, 2014, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (FirstEnergy) filed an application to establish a standard service offer (SSO) in the form of an electric security plan (ESP).

Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, establish the standard for intervention in the above-captioned proceeding. Section 4903.221, Revised Code, provides, in 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, Ohio Administrative Code, permits intervention to a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the

proceeding may impair or impede his ability to protect that interest and whose interest is not adequately represented by an existing party.

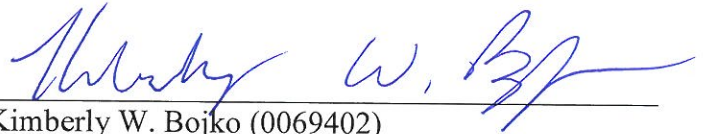
The OMAEG is a non-profit entity created by the Ohio Manufacturers' Association (OMA) for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and, advocating on behalf of OMA in critical cases before the Commission. The OMAEG's members are all members of the OMA. OMA members purchase electric services from FirstEnergy and will be affected by the Commission's determination in this matter. OMAEG is regularly and actively involved in Commission proceedings and, as in previous proceedings, its unique knowledge and perspective will contribute to the full development and equitable resolution of the issues in this proceeding.

Therefore, OMAEG has a direct, real, and substantial interest in the issues raised 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 that interest. OMAEG is regularly and actively involved in Commission proceedings, and as in previous proceedings, OMAEG's unique knowledge and prospective will contribute to the full development and equitable resolution of the factual issues in this proceeding, and OMAEG's interest will not be adequately represented by other parties to the proceeding. Finally, this timely intervention will not unduly delay or prolong the proceeding.

OMAEG satisfies the criteria set forth in Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code, 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 this motion for leave to intervene and that OMAEG be made a full party of record.

Respectfully submitted,



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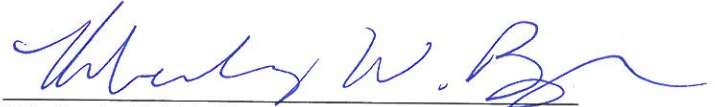
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## CERTIFICATE OF SERVICE

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



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Summary: Motion Motion to Intervene of the OMAEG electronically filed by Ms. Cheryl A Smith on behalf of The Ohio Manufacturers' Association