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Via E-FILE

April 28, 2016

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 16-0481-EL-UNC

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP's MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew

Encl.

Cc: Certificate of Service

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The filing by Ohio Edison Company,	:	
The Cleveland Electric Illuminating Company, and The	:	Case Nos. 16-0481-EL-UNC
Toledo Edison Company of a Grid Modernization	:	
Business Plan	:	

**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



Michael L. Kurtz, Esq.

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April 28, 2016

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The filing by Ohio Edison Company,	:		
The Cleveland Electric Illuminating Company, and The	:	Case Nos.	16-0481-EL-UNC
Toledo Edison Company of a Grid Modernization	:		
Business Plan	:		

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility Commission of Ohio (“Commission”) should grant the Ohio Energy Group (“OEG”) leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio (“Commission”). OEG’s members who are participating in this intervention are: Air Products and Chemicals, Inc., AK Steel Corporation, Alcoa Inc., BP-Husky Refining, LLC, Cargill, Incorporated, Charter Steel, Elyria Foundry, Fiat Chrysler Automobile USA LLC, Ford Motor Company, General Motors LLC, Greif Packaging, Johns Manville, Linde, LLC, Martin Marietta Magnesia Specialties, LLC, Materion Brush Inc., Nature Fresh Farms USA LLC, North Star BlueScope Steel, LLC, POET Biorefining, Praxair Inc., PTC Alliance Holding Corporation and Worthington Industries. These companies purchase electric distribution services from First Energy. Therefore, the interests of OEG’s members may be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



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COUNSEL FOR THE OHIO ENERGY GROUP

April 28, 2016

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 28th day of April, 2016 to the following:



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Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group