

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric ) Case No. 16-743-EL-POR  
Illuminating Company, and The Toledo )  
Edison Company For Approval of Their )  
Energy Efficiency and Peak Demand )  
Reduction Program Portfolio Plans for 2017 )  
through 2019. )

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

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Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves to intervene in this matter with the full powers and rights granted to intervening parties. OMAEG has a real and substantial interest that may be adversely affected by this proceeding and that interest cannot be adequately represented by any existing parties. Because OMAEG satisfies the standard for intervention set forth in the Public Utilities Commission of Ohio's (Commission) rules and by statute, the motion should be granted. A memorandum in support is attached.

Respectfully submitted,

/s/ Kimberly W. Bojko

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**MEMORANDUM IN SUPPORT**

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On April 15, 2016, the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, FirstEnergy) filed an application seeking approval of their energy efficiency and peak demand reduction program portfolio plans for 2017 through 2019 (Plan).<sup>1</sup> FirstEnergy states that the Plan was designed to reflect stakeholder input received from the Collaborative Group.<sup>2</sup> Examples of this input include a greater focus on LED lighting, inclusion of hot water circulating pumps in the residential and small enterprise sectors, small business direct install, and analytics-enabled energy efficiency recommendations.<sup>3</sup> Following the filing of its Plan, FirstEnergy and others filed a stipulated procedural schedule for the Commission’s approval.<sup>4</sup>

Ohio Adm. Code 4901-1-11 permits intervention by 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 its ability to protect that interest and whose interest is not adequately

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<sup>1</sup> FirstEnergy’s Application at 1 (April 15, 2016).

<sup>2</sup> Id. at 1.

<sup>3</sup> Id at 2.

<sup>4</sup> Motion Requesting Approval of Procedural Schedule at 2 (May 5, 2016).

represented by an existing party. Likewise, R.C. 4903.221 authorizes intervention where a party: may be adversely affected by the proceeding; will contribute to a full development and equitable resolution of factual issues; and will not unduly prolong or delay the proceedings.

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work 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; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. OMAEG members purchase electric services from FirstEnergy. Moreover, OMAEG has participated in prior proceedings involving FirstEnergy's energy efficiency and peak demand reduction program portfolio plans.<sup>5</sup>

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 perspective will contribute to the full development and equitable resolution of the factual issues in this proceeding. OMAEG's interest will not be adequately represented by other parties to the proceeding and its timely intervention will not unduly delay or prolong the proceeding.

Because OMAEG satisfies the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11, it is authorized to intervene with the full powers and rights granted by the

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<sup>5</sup> *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2013 through 2015*, Case No. 12-2190-EL-POR, et al., Opinion and Order at 3 (March 20, 2013) (recognizing OMAEG as an intervening party).

Commission to intervening parties. OMAEG respectfully requests that the Commission grant this motion to intervene and that OMAEG be made a full party of record.

Respectfully submitted,

/s/ Kimberly W. Bojko

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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 May 9, 2016.

/s/ Danielle M. Ghiloni \_\_\_\_\_  
Danielle M. Ghiloni

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Summary: Motion To Intervene Of The Ohio Manufacturers' Association Energy Group electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group