

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Filing by Ohio Edison Company,)	Case No. 16-481-EL-UNC
The Cleveland Electric Illuminating Company,)	
and The Toledo Edison Company)	
of a Grid Modernization Business Plan)	
)	
In the Matter of the Filing by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company)	Case No.17-2436-EL-UNC
Application for Approval of a Distribution Platform Modernization Plan)	
)	
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company to)	Case No.18-1604-EL-UNC
Implement Matters Relating to the Tax Cuts and Jobs Act of 2017)	
)	
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for)	Case No.18-1656-EL-TA
Approval of a Tariff Change)	
)	

**JOINT MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
BY
THE NORTHWEST OHIO AGGREGATION COALITION

AND BY
ITS MEMBER COMMUNITIES:**

**THE LUCAS COUNTY BOARD OF COMMISSIONERS, LAKE TOWNSHIP,
PERRYSBURG TOWNSHIP, THE CITY OF TOLEDO, THE CITY OF
PERRYSBURG, THE CITY OF MAUMEE, THE CITY OF OREGON,
THE CITY OF NORTHWOOD, THE CITY OF WATERVILLE, THE CITY
OF SYLVANIA, THE CITY OF ROSSFORD, THE VILLAGE OF DELTA,
THE VILLAGE OF OTTAWA HILLS, THE VILLAGE OF HOLLAND, AND
THE VILLAGE OF WALBRIDGE**

The Northwest Aggregation Coalition (NOAC) and the fifteen NOAC Communities listed above move to formally intervene in the above captioned matters. The fifteen Member Communities are each an opt-out aggregator for electric and a member of NOAC. Collectively, the fifteen Member Communities have over 130,000 residential participants and over 10,000 small business participants. The Member Communities themselves are also large users of electricity. Electric rates are a very important component to many other aspects of the NOAC Communities' and our citizens' and our employers' well-being; for example, through our economic development efforts.

Each of the above captioned cases are related to the TCJA or to grid modernization. The FirstEnergy distribution companies (the "Companies"), the Staff and other parties have filed a stipulation involving all of these matters. On November 15, 2018 the Hearing Officer granted the Companies' request to consolidate these matters.

The Movants are each parties to the earlier Case No. 18-0047 which concerned, the Commissioned ordered investigation regarding the TCJA. Historically NOAC has been involved in each of the FirstEnergy ESPs and other matters involving electric rates and expenditures.

In the captioned matters, vital interests of NOAC and the NOAC Communities are involved. The Commission promised that “every dime” of the tax cut would go back to customers. The Movants’ participation is necessary to ensure that this happens. Movants do not represent a narrow or special interest. Instead Movants are uniquely qualified to represent the interests of our aggregations, our aggregation customers, and all our citizens, and businesses and employers. Our participation is also vital to ensure that the additional \$560 million grid modernization proposed in the stipulation is warranted, not duplicative, cost-effective, transparent, and just and necessary.

We respectfully ask the Commission to grant this motion.

Respectfully submitted,

Filing for all parties:

/s/. Thomas R. Hays

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion and Memorandum in Support was served electronically upon the parties listed below on November 23, 2018.

/s/ Thomas R. Hays

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Counsel for Lucas County and NOAC

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in

Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-ATA

Summary: Motion Joint Motion to Intervene by the Northwest Ohio Aggregation Coalition and by the 15 Individual NOAC Communities electronically filed by Mr. Thomas R. Hays on behalf of NOAC and Lucas County Board of Commissioners and City of Toledo and Lake Township Board of Trustees and City of Sylvania and Village of Ottawa Hills and City of Perrysburg and City of Northwood and City of Maumee and The Village of Holland and City of Oregon and Perrysburg Township and City of Rossford and Village of Walbridge and City of Waterville and Village of Delta