

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 an Extension of
Their Distribution Modernization Rider**

Case No. 19-361-EL-RDR

**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 intervene in the above captioned matter pursuant to R.C. 4903.221 and Rule 4901-1-11, Ohio Administrative Code.

Our fifteen Communities are each an opt-out aggregator for electricity. Collectively we serve over 130,000 residential and over 10,000 small business participants. The NOAC Communities themselves are also large users of electricity.

In sum, fair electric rates are a very important to us from economic development to the welfare of our customers and our citizens.

The Companies' motion to extend Rider DMR arises from ESP4 (Case No. 14-1297-EL-SSO.) In that case, the PUCO itself created Rider DMR. NOAC and its individual communities opposed Rider DMR at that proceedings, to include our appeal pending before the Ohio Supreme Court. Since then NOAC's membership expanded. Here each of our current member communities opposes Rider DMR and thus seek to intervene. NOAC and its communities have participated in many other PUCO hearings. We thus have the requisite expertise to meaningfully contribute.

Our participation is necessary because we are uniquely qualified to advocate for our own communities' and our aggregation customers' interests. These interests will be harmed if Rider DMR is extended. Northwest Ohio's economy is extremely sensitive to electric rates because of our manufacturing and industrial base. Rider DMR harms both our employers and economic development. Too, many homeowners and renters have little disposable income. Rider DMR takes money that they need for their own use. The DMR charge is not for electricity that the customer uses. Instead it is corporate welfare that benefits only FirstEnergy's shareholders. We know that customers—both people and businesses—will spend their own money more wisely.

We respectfully ask the Commission to grant our joint motion to intervene.

Respectfully submitted,

Filing for all Movants:

/s/. Thomas R. Hays

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WE AGREE TO ELECTRONIC SERVICE

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 February 27, 2019.

/s/ Thomas R. Hays

Thomas R. Hays
Counsel for Lucas County and NOAC

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/27/2019 10:57:27 AM

in

Case No(s). 19-0361-EL-RDR

Summary: Motion Joint Motion to Intervene by NOAC and the 15 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