

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Edison, The Cleveland Electric	)	Case No. 20-1344-EL-UNC
Illuminating Company, and The Toledo	)	
Edison Company to Safely Resume	)	Case No. 20-1345-EL-WVR
Activities to Pre-COVID-19 Levels and	)	
Requests for Waivers.	)	

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**MOTION TO INTERVENE  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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Ohio should lead with its heart to protect consumers during these unprecedented times with many Ohioans struggling health-wise and financially. The Office of the Ohio Consumers' Counsel ("OCC") moves to intervene in this case where FirstEnergy has proposed to resume consumer disconnections as early as September 15, 2020.

FirstEnergy, which serves about half the electric consumers in the state, made its proposal despite reporting of an emerging trend of extraordinary widespread cases of coronavirus in all areas of the United States – rural and urban, over the last several months.<sup>1</sup> It's really a misnomer for there to be "transition" plans to so-called normal utility operations when the coronavirus is *not* transitioning; it is surging in parts of Ohio and the country.

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<sup>1</sup> [Veronica Stracqualursi](https://www.cnn.com/2020/08/02/politics/birx-coronavirus-new-phase-cnntv/index.html), *Birx warns US is 'in a new phase' of coronavirus pandemic with more widespread cases*, CNN (August 2, 2020), <https://www.cnn.com/2020/08/02/politics/birx-coronavirus-new-phase-cnntv/index.html>

In Ohio, food-insecurity has nearly doubled,<sup>2</sup> June rent went unpaid by half a million people,<sup>3</sup> poverty levels were already high – with minorities disproportionately represented in poverty,<sup>4</sup> coronavirus cases are surging in places,<sup>5</sup> and now loss of essential utility services through disconnection could make Ohio consumers' plight more desperate.

FirstEnergy's plan is ill-advised. FirstEnergy's plan is in denial of Ohioans' need for protection, not disconnection. FirstEnergy's plan should be denied regarding the resumption of consumer disconnections.

The PUCO should grant OCC's motion to intervene for the reasons set forth in the attached memorandum in support.

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<sup>2</sup> <http://ohiofoodbanks.org/files/2019-20/Press-Release-OAF-urges-SNAP-increase-6.15.20.pdf>.

<sup>3</sup> See <https://www.census.gov/data/tables/2020/demo/hhp/hhp8.html>, Housing Table 1(b), Ohio tab. See also <https://cohhio.org/9561-2/>.

<sup>4</sup> For example, poverty levels were 35.2 percent in Cleveland, 24.1 percent in Akron, 36.8 percent in Youngstown, and 26.5 percent in Toledo.

<sup>5</sup> See Governor's July 15, 2020 Address at <https://coronavirus.ohio.gov/static/docs/Address-to-People-of-Ohio-07-15-20.pdf>; See Attachment.

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Ambrosia E. Wilson

William Michael (0070921)  
Counsel of Record  
Ambrosia E. Wilson (0096598)  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

65 East State Street, 7th Floor  
Columbus, Ohio 43215-4213  
Telephone [Michael]: (614) 466-1291  
Telephone [Wilson]: (614) 466-1292  
[William.Michael@occ.ohio.gov](mailto:William.Michael@occ.ohio.gov)  
[Ambrosia.Wilson@occ.ohio.gov](mailto:Ambrosia.Wilson@occ.ohio.gov)  
(willing to accept service by e-mail)

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**MEMORANDUM IN SUPPORT**

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Ohioans continue to face severe health and financial challenges due to the coronavirus. The health and financial challenges in Cuyahoga County are on the rise due to the dangerous increase in coronavirus cases and hospitalizations in recent weeks.<sup>6</sup> Similar trends have been seen in Mahoning County and in Lucas County, for example.<sup>7</sup> This awful scenario will be even more difficult if the PUCO does not protect FirstEnergy consumers by denying FirstEnergy’s plan to resume disconnections, among other things. This pandemic has impacted all areas of life, and unemployment in the country is now considered the worst since the Great Depression. The PUCO should not allow FirstEnergy to rush back to so-called “normalcy” and start disconnecting consumers, when the coronavirus has not subsided to pre-pandemic conditions.

Five months after the declared state of emergency, FirstEnergy has finally filed its plan –but not its plan of what actions to undertake during the emergency. That plan was never publicly filed. Instead, FirstEnergy is now seeking approval to resume pre-

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<sup>6</sup> See <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/dashboards>.

<sup>7</sup> See *id.*

coronavirus operations, having skipped the step of seeking PUCO approval of an emergency plan for the public.

The Office of the Ohio Consumers' Counsel has statutory authority to represent the interests of FirstEnergy's two million residential electric utility customers under R.C. Chapter 4911. R.C. 4903.221 provides, in part, that any person "who may be adversely affected" by a Public Utilities Commission proceeding is entitled to seek intervention in that proceeding. The interests of FirstEnergy's residential customers may be "adversely affected" by this case. That is especially so if the customers are unrepresented in a proceeding that will examine FirstEnergy's measures to return to pre-coronavirus operations during what remains a time of health and financial crisis for many Ohioans. Thus, this element of the intervention standard in R.C. 4903.221 is satisfied.

R.C. 4903.221(B) requires the PUCO to consider the following criteria in ruling on motions to intervene:

- (1) The nature and extent of the prospective intervenor's interest;
- (2) The legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) Whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings;
- (4) Whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues.

First, the nature and extent of OCC's interest is representing the residential customers of FirstEnergy in this case where the Utility has a proposal to resume pre-coronavirus operations including disconnections, charging reconnection fees, and resuming some degree of social contact. FirstEnergy is making the proposal to soon

resume its normal operations notwithstanding the fact that the health and financial crisis caused by the coronavirus is still very much alive, with no end in sight. OCC's interest is different from that of any other party, and especially different from that of FirstEnergy whose advocacy includes the financial interest of its shareholders. Additionally, the PUCO specifically permitted input from "interested persons" on the other electric utilities' transition plans.<sup>8</sup> As a representative of the residential customers of FirstEnergy that are affected by the coronavirus and state of emergency, the OCC is an "interested person."

Second, OCC's advocacy for residential customers will include advancing the position that customers should remain connected during this emergency and for a reasonable period of time after the formal emergency ends (or the formal emergency should be extended). Transitioning to pre-coronavirus activities a little over a month from now, as FirstEnergy proposes, is too soon. Consumers are still facing a health and financial crisis now. Disconnections of consumers should continue to be avoided. OCC's position is therefore directly related to the merits of this case that is pending before the PUCO, the authority with regulatory control of public utilities' rates and service quality in Ohio.

Third, OCC's intervention will not unduly prolong or delay the proceedings. OCC, with its longstanding expertise and experience in PUCO proceedings, will duly allow for the efficient processing of the case with consideration of the public interest.

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<sup>8</sup> See, e.g., Case No. 20-650-EL-AAM, et. seq., Finding and Order (May 20, 2020) at para. 25; 50 (DP&L's emergency case).

Fourth, OCC's intervention will significantly contribute to full development and equitable resolution of the factual issues. OCC will obtain and develop information that the PUCO should consider for equitably and lawfully deciding the case in the public interest.

OCC also satisfies the intervention criteria in the Ohio Administrative Code (which are subordinate to the criteria that OCC satisfies in the Ohio Revised Code). To intervene, a party should have a "real and substantial interest" according to Ohio Adm. Code 4901-1-11(A)(2). As the advocate for residential utility customers, OCC has a very real and substantial interest in this case where the PUCO will determine how to best protect FirstEnergy's customers during this emergency and as FirstEnergy attempts to resume pre-coronavirus activities.

In addition, OCC meets the criteria of Ohio Adm. Code 4901-1-11(B)(1)-(4). These criteria mirror the statutory criteria in R.C. 4903.221(B) that OCC already has addressed and that OCC satisfies.

Ohio Adm. Code 4901-1-11(B)(5) states that the PUCO shall consider "The extent to which the person's interest is represented by existing parties." OCC does not concede the lawfulness of this criterion. It's unlawful. But OCC satisfies this criterion in that it uniquely has been designated as the state representative of the interests of Ohio's residential utility customers. That interest is different from, and not represented by, any other entity in Ohio.

Further, the Supreme Court of Ohio ("Court") confirmed OCC's right to intervene in PUCO proceedings, in deciding two appeals in which OCC claimed the PUCO erred by denying its interventions. The Court found that the PUCO abused its discretion in

denying OCC's interventions and that OCC should have been granted intervention in both proceedings.<sup>9</sup>

OCC meets the criteria set forth in R.C. 4903.221, Ohio Adm. Code 4901-1-11, and the precedent established by the Court for intervention. On behalf of Ohio residential customers, the PUCO should grant OCC's Motion to Intervene.

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Ambrosia E. Wilson

William Michael (0070921)

Counsel of Record

Ambrosia E. Wilson (0096598)

Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

65 East State Street, 7th Floor

Columbus, Ohio 43215-4213

Telephone [Michael]: (614) 466-1291

Telephone [Wilson]: (614) 466-1292

[William.Michael@occ.ohio.gov](mailto:William.Michael@occ.ohio.gov)

[Ambrosia.Wilson@occ.ohio.gov](mailto:Ambrosia.Wilson@occ.ohio.gov)

(willing to accept service by e-mail)

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<sup>9</sup> See *Ohio Consumers' Counsel v. Pub. Util. Comm.*, 111 Ohio St.3d 384, 2006-Ohio-5853, ¶¶13-20.



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Intervene was served on the persons stated below via electronic transmission, this 5th day of August 2020.

/s/ Ambrosia E. Wilson  
Ambrosia E. Wilson  
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

**SERVICE LIST**

[John.jones@ohioattornegeneral.gov](mailto:John.jones@ohioattornegeneral.gov)

[cwatchorn@firstenergycorp.com](mailto:cwatchorn@firstenergycorp.com)

**AS PREPARED ADDRESS TO THE CITIZENS OF OHIO  
OHIO GOVERNOR MIKE DEWINE  
OHIO STATEHOUSE CEREMONIAL OFFICE  
COLUMBUS, OH  
JULY 15, 2020**

Good evening.

I speak to you tonight from the Governor's office in the Ohio State Capitol.

We have now reached THE most critical point in our battle against the corona virus.

If all of us do not take immediate action to slow this virus down, the tragedy that we see playing out on our television screens every day in Florida, Texas, Arizona, and California may well be our reality in just a matter of weeks.

The good news is that this nightmare does not have to be our future.

Some have wondered what new health orders might be issued tonight. That's a discussion for another time.

As your Governor, I will take whatever action is necessary to protect the people of this state. But, the truth is, what your local health department or the Ohio Department of Health, or what I order is not nearly as important as what we all do in these crucial days ahead.

Our future truly lies in our own hands.

Ohioans have faced many challenges throughout time -- wars, floods, tornados -- but really nothing quite like this, since Governor James Cox was our Governor during the Spanish Flu Pandemic of 1918. Governor Cox and I are both from the Miami Valley, but the reason I keep his figure here is to remind me of the resilience and the strength of all the Ohioans who went through that tragedy.

And I know that Governor Cox must have felt, as I do every day, the pain and anguish of each family who lost someone to that virus.

Early this year, we watched as the corona virus erupted in China, then in Europe, then in the United States -- and then in Ohio.

But, in Ohio -- you did what Ohioans always do!

You rallied together!

You did what needed to be done early in this fight.

And you took a collective leap of faith in a battle against an invisible enemy -- the likes of which hadn't been seen in Ohio and this country in more than 100 years.

You made extraordinary sacrifices.

You left school.

You left work.

You stayed home.

You missed loved ones.

You missed milestones.

You missed paychecks.

Because you are Ohioans -- strong, steadfast, selfless -- you also saved lives.

You flattened the curve!

And, with your individual -- and collective -- actions, you bought Ohio time -- precious, finite time for our health care providers to create a statewide hospital system and for doctors and nurses to learn more about this novel illness and how best to respond...

Time for Ohio to procure lifesaving medical equipment, such as ventilators, as well as Personal Protection Equipment (PPE)...

And with no vaccine in sight, time to learn how to better manage this disease so we could carefully and responsibly re-open the state to protect both our lives and our livelihoods.

We sought input from business leaders throughout the state and listened to the scientists and other health experts to develop guiding protocols to open in an incremental, measured way that could protect the safety of employees and customers, alike.

By controlling the spread of the virus early on, we were able to responsibly re-open, and the Ohio economy has started coming back. Ohio's unemployment rate is coming down. While in April, the revised rate was 17.6 percent, in May, the rate dropped to 13.7 percent.<sup>1</sup> And further, for 10 straight weeks, applications for continued unemployment benefits have declined.<sup>2</sup>

We must keep the virus in check so that we can rebuild consumer confidence and keep this positive economic momentum going.

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<sup>1</sup> State Unemployment Rates: Bureau of Labor Statistics: <https://www.bls.gov/news.release/laus.nr0.htm>.

<sup>2</sup> Ohio Department of Job and Family Services, accessed July 14, 2020, <https://ifs.ohio.gov/ocomm/pdf/Ohio-Initial-Jobless-Claims.pdf>.

So where are we now?

Clearly -- clearly the virus is spreading with a vengeance across many parts of Ohio and lurks, waiting to attack victims in all of our 88 counties.

Tragically, in just four months, we have already lost 3,075 Ohioans to this dreaded disease -- nearly the same number of Ohioans who died in the Vietnam War (3,094).<sup>3</sup>

Our hospitals are seeing more and more COVID patients. There are 1,027 of our fellow citizens in our hospitals tonight suffering from COVID -- 316 are in intensive care -- 146 are on a ventilator.<sup>4</sup> And, many of those who have recovered now suffer from long-term -- and in some cases, permanent -- health consequences, such as lung damage, kidney damage, and other significant medical issues.

Ohio is now nearing our April and May peak of just over 1,100 hospital patients, with the Cincinnati and Dayton regions currently seeing more COVID-positive patients in their hospitals than during any previous time during the pandemic and the Cleveland region nearing a similar point<sup>5</sup>

At the beginning of the pandemic, it took Ohio 20 days to reach our first 1,500 total cases. Last week, we saw over 1,500 cases in a single day.<sup>6</sup> And to think -- just a month ago -- we were at only 400 new cases per day.<sup>7</sup>

Some say that our case numbers are increasing because we are simply doing more testing. Yes -- we are testing more. In fact, our testing has gone up by 87 percent. But, our number of positive cases has skyrocketed by almost 200 percent!<sup>8</sup>

Clearly, our number of new cases is NOT just the result of increased testing!

Let's look again at Ohio and Florida. On June 9<sup>th</sup>, Florida had 1,200 cases per day -- about the same number of cases that we had in Ohio yesterday.<sup>9</sup> This past Sunday, just one month later, Florida's case number was at 15,300 new cases in one single day.<sup>10</sup>

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<sup>3</sup><https://www.archives.gov/research/military/vietnam-war/casualty-statistics>.

<sup>4</sup> Ohio Department of Health, [www.coronavirus.ohio.gov](http://www.coronavirus.ohio.gov).

<sup>5</sup> Ohio Department of Health, [www.coronavirus.ohio.gov](http://www.coronavirus.ohio.gov).

<sup>6</sup> Ohio Department of Health, [www.coronavirus.ohio.gov](http://www.coronavirus.ohio.gov).

<sup>7</sup> Ohio Department of Health, [www.coronavirus.ohio.gov](http://www.coronavirus.ohio.gov).

<sup>8</sup> Ohio Department of Health, [www.coronavirus.ohio.gov](http://www.coronavirus.ohio.gov).

<sup>9</sup> State-level Data by Report Date, as compiled by the COVID Tracking Project, <https://covidtracking.com/data/download>.

<sup>10</sup> "Two Days of Record Counts: Florida Adds 12,624 COVID Cases Monday, One Day after U.S.-shattering Record 15,300," by David Fleshler, *South Florida Sun Sentinel*, July 13, 2020.

Similarly, a month ago, Florida averaged 8.3 new cases per 100,000 residents per day, a little bit under what we have in Ohio currently. As of yesterday, Florida's new cases have increased six-fold per day (51.8 cases per 100,000 residents per day).<sup>11</sup>

A month ago, Arizona was also at 1,200 new cases per day.<sup>12</sup> As of Sunday, Arizona was at 3,400 new cases per day. Further, Arizona averaged almost 18 new cases per 100,000 residents per day last month. That has since increased 2.5 times as of yesterday (45.1 cases per 100,000 residents per day).<sup>13</sup>

And, if we do not change course...Florida and Arizona will be our future.

I have always found history to be a teacher. And so early in the pandemic, I read a book by John Berry called *The Great Influenza*. It's about the catastrophic Spanish Flu of 1918. He wrote an article yesterday that puts our current reality into sobering perspective:<sup>14</sup>

“This is our second chance. We won't get a third. If we don't get the growth of this pandemic under control now, in a few months, when the weather turns cold and forces people to spend more time indoors, we could face a disaster that dwarfs the situation today.”

Ohio is sliding -- sliding down a very dangerous path, with our once flattened-curve starting to sharpen and spike.

This worrisome, disturbing reversal of our progress is a jarring reminder of just how quickly our fate can change.

A matter of weeks can change our trajectory.

Weeks can alter our future.

Weeks can change our lives.

Weeks can be the difference between who lives and who dies in Ohio.

We must act -- and we must act now!

This is not a drill.

This is not a hoax.

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<sup>11</sup> State-level Data by Report Date, as compiled by the COVID Tracking Project, <https://covidtracking.com/data/download>.

<sup>12</sup> <https://coronavirus.jhu.edu/data/state-timeline/new-confirmed-cases/arizona>.

<sup>13</sup> State-level Data by Report Date, as compiled by the COVID Tracking Project, <https://covidtracking.com/data/download>.

<sup>14</sup> <https://www.nytimes.com/2020/07/14/opinion/coronavirus-shutdown.html>.

This is not a dress rehearsal.

It's the real thing.

The enemy is here -- and Ohioans have simply come too far in this fight to cede ground now.

My fellow Ohioans, you have changed history with this virus before -- and you can do it again -- but our window of opportunity may soon be closing.

As we have seen in Florida, California, Arizona, and Texas, once things start moving, they move very quickly -- and it is so very hard then to turn things back around.

My fellow Ohioans -- you -- all of us together -- have the power to change our future.

This is a defining time -- THE defining time -- for each one of us. And there has been no greater call in recent times for Ohioans than for us to call upon our "better angels," as President Abraham Lincoln said, and do what is right to protect each other.

Ohioans have always been a people, who have been willing to sacrifice today for a better tomorrow.

I am asking each of you tonight to take action now -- to sacrifice now -- so our kids can be in school this fall...

So, they can at least have a chance to play sports...

So, our businesses can remain open...

So that Ohioans can continue earning a living and a paycheck and support their families...

What am I asking you to do?

Let's start with masks. I am asking each one of you, wherever you live in Ohio -- whatever the alert color of your county -- to wear a mask when you go out in public.

Some may still question the wisdom of wearing masks, but as we used to say when I was a prosecuting attorney, "The jury is back. The verdict is in."

There is a broad consensus today in the medical, health, and business communities that masks are critical.

Yesterday, Dr. Robert Redfield, Director of the Centers for Disease Control and Prevention, said,

“If all of us would put on a face covering now for the next four weeks, six weeks, we could drive this epidemic to the ground.”<sup>15</sup>

Wearing masks is also our best way to protect Ohio jobs.

A recent Goldman Sachs report shows that wearing face masks can be viewed as an alternative to lockdowns. They found, that in most cases, within a couple of weeks of people consistently wearing facemasks, there was a slowdown in the spread of the virus. Further, the study suggests that to curb the spread of the virus as successfully as wearing face masks does, we would have to consider a lockdown that essentially would subtract five percent of the country’s Gross Domestic Product.<sup>16</sup>

But masks are not enough.

Let’s be honest, all of us have started to let our guard down. I know sometimes I have. We’re tired. We want to go back to the way things were – and that’s very understandable.

But when we do, we are playing Russian Roulette with our lives.

Good decisions will protect the economy and save lives. Reckless ones will hurt and kill.

These are tough questions, but ask yourselves: Will that family reunion be worth it if your grandmother later tests positive for COVID and dies?

Will that neighborhood cookout be worth it if your neighbor ends up alone, on a ventilator, in intensive care?

Will that play date be worth it, if the kids can’t go back to school in the fall?

We’re all tired of being cooped up. I know your kids want to be with their friends. And, Fran and I know our grandchildren certainly do.

But, what’s better? Knowing you did all you could to keep your family and neighbors safe and our economy open -- or taking risks that lead to illness, death, and another economic shutdown?

Don’t we all want to be around to meet our future children and grandchildren not yet born? To attend their Baptisms? To watch our kids and grandkids graduate from school? To attend their future weddings?

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<sup>15</sup> <https://www.usatoday.com/story/news/health/2020/07/15/covid-19-california-testing-moderna-vaccine-best-buy-requires-masks/5436928002/>.

<sup>16</sup> Face Masks and GDP: Goldman Sachs, <https://www.goldmansachs.com/insights/pages/face-masks-and-gdp.html>.

This virus will end. It will end! And we all want to be around when it does, so we can enjoy life, enjoy our families, and enjoy our friends.

None of us can do this, alone. In words often attributed to Ronald Reagan, “We can’t help everyone, but everyone can help someone.”<sup>17</sup>

These are once-in-a-hundred-years sacrifices -- short-term inconveniences, for long-term freedoms.

In his January 1941 State of the Union Address to Congress, President Franklin Roosevelt began to make his case to end the isolation policies that emerged following World War I. He spoke of America’s need to sacrifice in times of crisis -- and the unity that comes with a nation’s collective actions. Here is what said:

“No one can tell the exact character of the emergency situations that we may be called upon to meet. The nation's hands must not be tied when the nation's life is in danger. [All of us] must prepare to make the sacrifices that the emergency -- almost as serious as war, itself -- demands. . . . Our strength is our unity of purpose...[and] to that high concept, there can be no end save victory.”<sup>18</sup>

Our state’s life is now in danger -- and our own strength lies in our unity of purpose.

Early in this pandemic, Ohioans came together. You showed extraordinary kindness, care, compassion your families, friends, neighbors, and strangers, alike.

You rose to the occasion.

You answered the call.

I am calling on all Ohioans to once again unite.

This virus is real.

It is killing our family members, our friends, our co-workers.

We must take the long-view in our response to it and remember that Ohioans have always been a strong, determined, resilient people, who, time and time again, have overcome adversity and beat the odds.

From the Native Americans, who created intricate and massive earthworks...

To the pioneers, who navigated their way along the Ohio River and constructed the National Road...

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<sup>17</sup>[https://en.wikiquote.org/wiki/Ronald\\_Reagan](https://en.wikiquote.org/wiki/Ronald_Reagan).

<sup>18</sup><https://www.americanrhetoric.com/speeches/PDFFiles/FDR%20-%20Four%20Freedoms.pdf>.



To the abolitionists and African Americans, who worked together to create an underground railroad leading those in slavery to freedom...

To the immigrants, who built our cities...

To the African Americans and those from Appalachia, who migrated to Ohio to work, raise a family, and start a better life...

At the start of this pandemic, Ohioans set the example for the rest of our country. Though this has been a trying time for all Ohioans, you showed the world what was possible when people work together!

You showed the world our Ohio grit!

I remain an optimist and truly believe that we will rise out of the great tragedy of this virus and all it has laid bare. Positive things will come out of our struggle -- American and Ohio ingenuity, innovation, and creativity; deeper relationships with family and friends; and a stronger, renewed sense of community and our obligations to one other.

Out of this struggle, we will learn.

And, we will emerge stronger, better, and more resilient.

As the Bible tells us in Galatians, "Let us not grow weary of doing good, for in due season, we will reap -- if we do not give up."

Ohioans never give up.

And Ohioans will not grow weary of doing good and helping to protect each other.

We are Buckeyes.

We are strong.

And we will not relent, as we forge a path forward -- united -- in building Ohio's future.

**This foregoing document was electronically filed with the Public Utilities**

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**in**

**Case No(s). 20-1344-EL-UNC, 20-1345-EL-WVR**

Summary: Motion Motion to Intervene by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Wilson, Ambrosia E.