

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Distribution)
Modernization Rider of Ohio Edison Company,) Case No. 17-2474-EL-RDR
The Cleveland Electric Illuminating Company,)
And The Toledo Edison Company.)

**MOTION FOR LEAVE TO FILE NOTICE OF APPEARANCE AND MEMORANDUM IN
SUPPORT BY INDUSTRIAL ENERGY USERS-OHIO**

Matthew R. Pritchard (Reg. No. 0088070)
(Counsel of Record)
Rebekah J. Glover (Reg. No. 0088798)
McNees Wallace & Nurick LLC
21 East State Street, 17TH Floor
Columbus, OH 43215
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
(willing to accept service by e-mail)

March 7, 2021

Counsel for Industrial Energy Users-Ohio

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**INDUSTRIAL ENERGY USERS-OHIO'S NOTICE OF
WITHDRAWAL OF COUNSEL, AND
MOTION FOR LEAVE TO FILE NOTICE OF APPEARANCE**

Industrial Energy Users-Ohio hereby provides notice of withdrawal of Frank P. Darr as counsel in the above-captioned proceeding. In addition, in accordance with Rule 4901-1-08, Ohio Administrative Code, and the March 15, 2021 Entry in this proceeding, IEU-Ohio hereby respectfully moves the Public Utilities Commission of Ohio ("Commission") for leave to file a notice of appearance of additional counsel in the above-captioned proceeding. If leave is granted, IEU-Ohio hereby notices the addition of Rebekah Glover as co-counsel for IEU-Ohio in this matter. Matt Pritchard will remain as counsel for record for IEU-Ohio. The reasons supporting IEU-Ohio's Motion for Leave to File a Notice of Appearance are fully set forth in the Memorandum in Support.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)
(Counsel of Record)

Rebekah J. Glover (Reg. No. 0088798)

McNees Wallace & Nurick LLC
21 East State Street, 17TH Floor
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MEMORANDUM IN SUPPORT

In support of this Motion for Leave to File a Notice of Appearance, IEU-Ohio states that it timely intervened in this proceeding on July 2, 2019. In the intervening time, counsel for IEU-Ohio has changed, including an attorney that is no longer representing IEU-Ohio. As part of this filing, IEU-Ohio has provided notice of the withdrawal of that counsel for IEU-Ohio. IEU-Ohio would like to add co-counsel to this case to substitute for the withdrawn counsel so that IEU-Ohio can appropriately staff the proceeding with multiple attorneys to provide flexibility in participating in Commission proceedings, many of which have overlapping procedural schedules.

The March 15, 2021 Entry in this proceeding set a deadline for notices of additional counsel of March 26, 2021, in order to allow ample time to provide instructions on how to participate remotely in the April 8, 2021 prehearing conference. IEU-Ohio respectfully requests that the Commission grant leave for additional counsel to appear after this deadline, as the prehearing conference has not yet occurred and granting the leave to notice the appear of additional counsel will not cause undue delay or hardship to any parties or to the Commission.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)
(Counsel of Record)

Rebekah J. Glover (Reg. No. 0088798)

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rglover@mcneeslaw.com
(willing to accept service by e-mail)

Counsel for Industrial Energy Users-Ohio

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion for Leave to File Notice of Appearance and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for Industrial Energy Users-Ohio, to the following parties of record on this 7th day of April 2021, via electronic transmission, hand-delivery or U.S. mail, postage prepaid.

/s/Matthew R. Pritchard

Matthew R. Pritchard

scasto@firstenergycorp.com
bknipe@firstenergycorp.com
jlang@calfee.com
khehmeyer@beneschlaw.com
mkeaney@beneschlaw.com
radoringo@jonesday.com
mrgladman@jonesday.com
mdengler@jonesday.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylern@BKLawfirm.com
maureen.willis@occ.ohio.gov
william.michael@occ.ohio.gov
john.finnigan@occ.ohio.gov

rdove@keglerbrown.com
drinebolt@opae.org
mfleisher@dickinsonwright.com
mwise@mcdonaldhopkins.com
Bojko@carpenterlipps.com
Donadio@carpenterlipps.com
ccox@elpc.org
thomas.lindgren@ohioattorneygeneral.gov
kyle.kern@ohioattorneygeneral.gov
werner.margard@ohioattorneygeneral.gov

Attorney Examiner:

Gregory.price@puco.ohio.gov
Megan.addison@puco.ohio.gov

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Case No(s). 17-2474-EL-RDR

Summary: Motion for Leave to File Notice of Appearance and Memorandum in Support electronically filed by Ms. Rebekah J. Glover on behalf of Industrial Energy Users-Ohio