

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE OHIO CITING BOARD'S REVIEW OF OHIO ADM. CODE CHAPTERS 4906-1, 4906-2, 4906-3, 4906- 4, 4906-5, 4906-6, AND 4906-7	: : : : : :	21-902-GE-BRO
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**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to R.C. 4903.221 and Ohio Adm. Code §4901-1-11, the Ohio Energy Group (“OEG”) moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio (“Commission”) should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission’s disposition of this proceeding may impair or impede OEG’s ability to protect that interest.

Respectfully submitted,

/s/ Michael L. Kurtz

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September 20, 2021

COUNSEL FOR OHIO ENERGY GROUP

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**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-01-11, the Public Utilities Commission of Ohio ("Commission") should grant the Ohio Energy Group ("OEG") leave to intervene in this proceeding.

OEG is a non-profit entity organized to represent the interests of large industrial customers in electric and gas regulatory proceedings before the Public Utilities Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Air Products and Chemicals, Inc., Amsted Rail Company, Inc., Cargill, Incorporated, Charter Steel, Cleveland-Cliffs Steel Corporation (fka AK Steel Corporation), Cleveland-Cliffs Steel LLC (fka ArcelorMittal USA), Cleveland-Cliffs, Inc., Ford Motor Company, GE Aviation, General Motors LLC, Greif, Inc., Howmet Aerospace Inc., Johns Manville, JSW Steel (USA), Inc., Martin Marietta Magnesia Specialties, LLC, Materion Corporation, Messer LLC, Molson Coors Beverage Company, Nature Fresh Farms USA LLC, North Star BlueScope Steel, LLC, POET Biorefining, Linde Inc. (formerly Praxair), PTC Alliance Holding Corporation, Stellantis (fka Fiat Chrysler), TimkenSteel Corporation and Worthington Industries. These companies purchase electric and gas services from the Ohio distribution utilities. Therefore, the interests of OEG's members may

be directly affected by the outcome of this proceeding. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under R.C. 4903.221 and Ohio Adm. Code 4901-1-11.

Respectfully submitted,

/s/ Michael L. Kurtz

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September 20, 2021

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 on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail, when available) on the 20th day of September, 2021 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
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Summary: Motion Ohio Energy Group (OEG) Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group