

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Non-Market- :
Based Services Rider Contained in the Tariffs of : Case Nos. 21-1225-EL-RDR
Ohio Edison Company, The Cleveland Electric :
Illuminating Company, and The Toledo Edison :
Company :

**THE OHIO ENERGY GROUP'S
MOTION FOR LEAVE TO INTERVENE**

Pursuant to the Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility 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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February 22, 2022

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Non-Market-	:
Based Services Rider Contained in the Tariffs of	:
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**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-01-11, the Public Utility 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 Utility Commission of Ohio (“Commission”). OEG’s members who are participating in this intervention are: Air Products and Chemicals, Inc, ArcelorMittal Tubular Products Shelby LLC, BP-Husky Refining, LLC, Cargill, Incorporated, Charter Steel, Cleveland-Cliffs Steel Corporation, (fka AK Steel Corporation), Cleveland-Cliffs Steel LLC (fka ArcelorMittal North America), Ford Motor Company, General Motors LLC, Greif, Inc., Howmet Aerospace Inc., Johns Manville, Linde, Inc. (fka Praxair), Martin Marietta Magnesia Specialties, LLC, Materion Corporation, Messer, LLC, Nature Fresh Farms USA LLC, North Star BlueScope Steel, LLC, POET Biorefining, PTC Alliance Holding Corporation, Stellantis (fka Fiat Chrysler), TimkenSteel Corporation and Worthington Industries. These companies purchase electric distribution services from First Energy. 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 Ohio Rev. Code §4903.221 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,

/s/ Michael L. Kurtz

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**COUNSEL FOR THE OHIO ENERGY
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February 22, 2022

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) on the 22nd day of February 2022 to the following:

/s/ Michael L. Kurtz

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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