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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO  
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In the Matter of the Application of )	
FIRSTENERGY CORP. on behalf of Ohio )	
Edison Company, Cleveland Electric )	PUCO
Illuminating Company and Toledo Edison )	Case No. 99-1212-EL-ETP
for Approval For Transition Plans )	
)	
In The Matter of The Application of )	
FIRSTENERGY CORP. on Behalf )	
of Ohio Edison Company, and )	Case No. 99-1213-EL-ATA
The Toledo Edison Company )	
for Tariff Approval )	
)	
In The Matter of The Application of )	
FIRSTENERGY CORP. on Behalf )	
of Ohio Edison Company )	Case No. 99-1214-EL-AAM
and The Toledo Edison Company for )	
Certain Accounting Authority )	

**MOTION OF PP&L ENERGY PLUS CO., LLC  
TO INTERVENE**

Pursuant to Ohio Revised Code ("R.C.") Section 4903.22.1 and Ohio Administrative Code ("OAC") Rule 4901-1-11, PP&L EnergyPlus Co., LLC ("EnergyPlus"), hereby moves to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant EnergyPlus leave to intervene because EnergyPlus has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding will affect EnergyPlus' ability to protect their interests. Reasons which support EnergyPlus' Motion are addressed below.

**MEMORANDUM IN SUPPORT**

EnergyPlus is a wholly owned subsidiary of PP&L, Inc. and is licensed as a retail electricity supplier in the states of Pennsylvania, New Jersey, Delaware Montana, and Maine and serves a significant amount of retail electric load in Pennsylvania. As such, EnergyPlus is knowledgeable and experienced in competitive energy supply and serving retail customers in

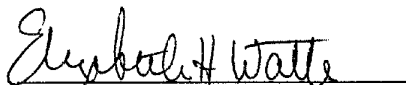
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competitive markets and has been an active marketer since the inception of the Pennsylvania Customer Choice Pilot Program in 1997. EnergyPlus has compelling interests in the development of a robust competitive electric market in Ohio. Issues relevant to EnergyPlus' interests will be determined in this matter and no other party to this proceeding would adequately represent EnergyPlus' interests. Therefore, it is vital to those interests that EnergyPlus be permitted to intervene.

WHEREFORE EnergyPlus moves the Commission to grant their motion to intervene.

Respectfully submitted on behalf of  
PP&L EnergyPlus Co., LLC



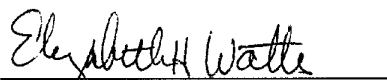
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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing Motion of PP&L EnergyPlus Co., LLC to Intervene was served upon the parties listed on the attached Service List by regular U.S. Mail, postage prepaid, this 29th day of October, 1999.



Elizabeth H. Watts

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