

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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RECEIVED-DOCKETING DIV  
2005 SEP 23 PM 3:44  
PUCO

In the Matter of the Joint Application of )  
Ohio Edison Company, The Cleveland ) Case No. 05-704-EL-ATA  
Electric Illuminating Company and )  
The Toledo Edison Company )  
For Approval of a Generation Charge )  
Adjustment Rider )

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 05-1125-EL-ATA  
Edison Company for Authority to ) Case No. 05-1126-EL-AAM  
Modify Certain Accounting Practices ) Case No. 05-1127-EL-UNC  
And for Tariff Approval )

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**JOINING BY THE NORTHEAST OHIO PUBLIC ENERGY COUNCIL  
AND BY THE CITIES OF MAUMEE, NORTHWOOD, OREGON, PERRYSBURG,  
SYLVANIA, AND TOLEDO, THE VILLAGE OF HOLLAND, THE BOARD OF LAKE  
TOWNSHIP (WOOD COUNTY) TRUSTEES AND THE BOARD OF LUCAS COUNTY  
COMMISSIONERS, COLLECTIVELY KNOWN AS THE NORTHWEST OHIO  
AGGREGATION COALITION ("NOAC")  
IN OFFICE OF CONSUMERS' COUNSEL'S  
MOTION FOR A CASE SCHEDULE  
OR, IN THE ALTERNATIVE, MEMORANDUM CONTRA APPLICANTS'  
MOTION FOR CONSOLIDATION AND  
REQUEST FOR EXPEDITED RULING**

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The Northeast Ohio Public Energy Council ("NOPEC"), an intervenor in this case, and the cities of Maumee, Northwood, Oregon, Perrysburg, Sylvania, and Toledo, the Village of Holland, the Board Of Lake Township (Wood County) Trustees and the Board of Lucas County Commissioners, collectively known as the Northwest Ohio Aggregation Coalition ("NOAC") pursuant to Ohio Adm. Code §4901-1-12, hereby file to join in the Office of the Ohio Consumers' Counsel ("OCC") Motion in this case filed September 22, 2005 requesting the Public Utilities Commission of Ohio ("Commission" or "PUCO") to set a new procedural

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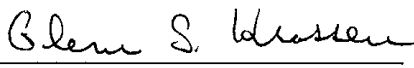
schedule that supersedes and extends beyond the schedule established for Case No. 05-704-EL-ATA and, in the alternative, OCC's memorandum contra the Applicant's Motion for Consolidation, in the event the PUCO does not extend the schedule in Case 05-704-EL-ATA.

NOPEC and NOAC join in OCC's Motion and Memorandum Contra and request for expedited ruling for all of the reasons set forth in OCC's September 22, 2005 filing. Additionally, NOPEC and NOAC specifically request that the procedural dates in the proceeding be set, and the procedure in the case ordered, as follows. The procedural schedule below would replace and supersede the current schedule in Case No. 05-704-EL-ATA, including the September 30, 2005 testimony filing date:

- (a) Applicant's testimony to be filed on October 6, 2005.
- (b) Intervenors' testimony to be filed November 11, 2005.
- (c) Evidentiary hearing to begin November 30, 2005.
- (d) In view of the schedule, require a ten (10) day period for all discovery responses.
- (e) Require that documents be served by e-mail.

The undersigned counsel has contacted OCC and represents that OCC supports the procedural schedule requested above.

Respectfully submitted,

  
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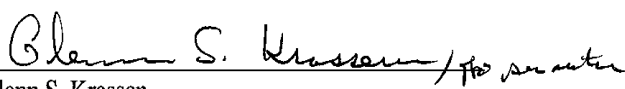
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Attorney for the Northwest Ohio Aggregation  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Joining of the Northeast Ohio Public Energy Council and Northwest Ohio Aggregation Coalition in Office of Consumers' Counsel's Motion for a Case Schedule or, in the Alternative, Memorandum Contra Applicants' Motion for Consolidation and Request for Expedited Ruling was served upon the parties of record indicated on the attached service list this 23<sup>rd</sup> day of September, 2005, by postage prepaid or e-mail.

  
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