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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of FirstEnergy)
Corp. on Behalf of Ohio Edison Company,)
The Cleveland Electric Illuminating Company)
And The Toledo Edison Company for Approval)
Of Tariff Adjustments.)

Case No. 01-2736-EL-UNC

Motion of Citizen Power, Inc.,
David Hughes, Kelli O'Neill, Ron O'Connell, and Marguerite Schossler
To Intervene
and Memorandum In Support

William M. Ondrey Gruber
Attorney-at-Law (Registration No. 0005950)
2714 Leighton Road
Shaker Heights, Ohio 44120
(216) 371-3570
E-Mail: GruberWL@aol.com

Attorney for Citizen Power

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To Intervene

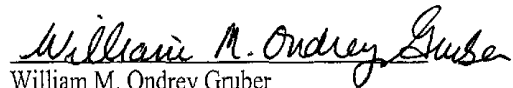
Citizen Power, Inc., David Hughes, Kelli O’Neill, Ron O’Connell, and Marguerite Schossler (collectively referred to as “Citizen Power”) hereby respectfully move the Public Utilities Commission of Ohio (“Commission”), pursuant to R. C. 4903.221 and Section 4901-1-11 of the Ohio Administrative Code, to intervene in the above-captioned case, with the full powers and rights granted by the Commission specifically, by statute and by the provisions of the Ohio Administrative Code to intervening parties.

Citizen Power is a not-for-profit research, education and advocacy organization (i.e. under Section 501 (c) (3) of the U. S. Internal Revenue Code), with offices in Ohio and Pennsylvania. David Hughes is the Executive Director of Citizen Power, and Kelli O’Neill, Ron O’Connell, and Marguerite Schossler are Trustees and members of Citizen Power, Inc., and each of these Intervenor is a customer of Cleveland Electric Illuminating Company (“CEI”), an operating Company of FirstEnergy. A more detailed description of Citizen Power, the reasons for its intervention and why such intervention should be granted by the Commission, are set forth

in the Memorandum in Support, as well as in Citizen Power's Memorandum Contra the Application, which is being filed at the same time as this Motion, both of which are incorporated in this Motion.

No proceedings, orders or entries have been issued in this proceeding, and thus this Motion is timely and should be granted by the Commission to ensure a full and fair review, analysis and public hearing of FirstEnergy's Application.

Respectfully submitted,



William M. Ondrey Gruber
Attorney-at-Law
(Registration No. 0005950)
2714 Leighton Road
Shaker Heights, Ohio 44120
(216) 371-3570
E-Mail: GruberWL@aol.com

December 4, 2001

Attorney for Citizen Power

BEFORE
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Memorandum of Citizen Power, Inc.,
David Hughes, Kelli O'Neill, Ron O'Connell, and Marguerite Schossler
In Support of Motion to Intervene

Citizen Power should be permitted to intervene in these matters according to R. C. 4903.221 and the Commission's Rules and Regulations contained in Section 4901-1-11 of the Ohio Administrative Code. Moreover, Citizen Power should be permitted to intervene with the full powers and rights granted by the Commission specifically, by statute and by the provisions of the Ohio Administrative Code to intervening parties.

Citizen Power, Inc. is a not-for-profit research, education and advocacy organization (i.e. under Section 501 (c) (3) of the U. S. Internal Revenue Code), with offices in Ohio (at 2424 Dock Road, Madison, Ohio 44057), and Pennsylvania (at 2121 Murray Avenue, Pittsburgh, Pennsylvania 15217). Citizen Power has established an Electric Restructuring Education Project with the primary mission of promoting the development of safe, clean, and affordable energy sources, as well as the efficient use of energy. David Hughes is the Executive Director of Citizen Power and Kelli O'Neill, Ron O'Connell, and Marguerite Schossler are

Trustees of Citizen Power, and each of the Intervenor is a customer of The Cleveland Electric Illuminating Company, an operating company of FirstEnergy.

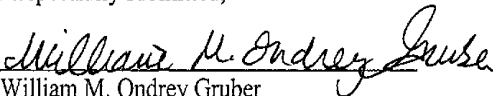
Citizen Power has a long history of involvement in electric regulatory matters. In the period from 1986 through 1989, Citizen Power, then known as "Concerned Citizens," intervened at the Commission in the Perry 1 and Beaver Valley 2 investigations concerning the prudence of the construction costs for the two nuclear power plants, and the case concerning the base rates of Cleveland Electric Illuminating Company. Citizen Power also intervened before the FERC in the FirstEnergy merger case (Docket No. ER 97-413). Further, Citizen Power was granted intervention and actively participated in the FirstEnergy Transition Case before this Commission (Case Nos. 99-1212-EL-ETP, 99-1213-EL-ETP, and 99-1214-EL-ETP.)

Citizen Power, and each of the named individual customers of CEI have a direct, real and substantial interest in this proceeding. This case may have a substantial effect on the manner in which the Commission evaluates whether an adequate level of shopping has occurred during the market development period within the service areas of the three service companies of FirstEnergy, including CEI. This determination may proceed upon the methodology ultimately used in this case to determine whether the service Companies have achieved at least a 20% shopping rate, and thus whether the RTC recovery period is reduced, which would reduce the amount recovered by the Companies. A more detailed description of Citizen Power's position and interest in this proceeding is set forth in its Memorandum Contra the Application of FirstEnergy, which is being filed at the same time as this Motion and Memorandum in Support

of Intervention, and said Memorandum Contra is incorporated herein.

Citizen Power's participation in these proceedings will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of the issues and concerns raised in these proceedings. Furthermore, Citizen Power's interests will not be adequately represented by other parties to these proceedings as its interests are particular to Northeast Ohio and the territory of FirstEnergy, and only one other party, a marketer of energy, has moved to intervene. Therefore, Citizen Power is entitled to intervene and fully participate in this proceeding.

Respectfully submitted,



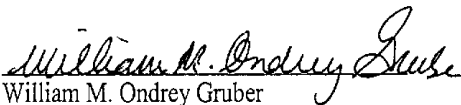
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December 4, 2001

Attorney for Citizen Power

Certificate of Service

I certify that a copy of this Motion to Intervene and Memorandum In Support has been sent to the Applicant and Intervenor Enron by regular U. S. mail this 4th day of December, 2001.


William M. Ondrey Gruber