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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) Case No. 99-1212-EL-ETP
Cleveland Electric Illuminating) Case No. 99-1213-EL-ATA
Company and The Toledo Edison) Case No. 99-1214-EL-AAM
Company for Approval for Their)
Transition Plans and for Authorization)
To Collect Transition Revenues.)
)
- In the Matter of the Application of)
The Cincinnati Gas & Electric Company) Case No. 99-1658-EL-ETP
For Approval of its Electric Transition Plan) Case No. 99-1659-EL-ATA
Approval of Tariff Changes and New) Case No. 99-1660-EL-ATA
Tariffs, Authority to Modify Current) Case No. 99-1661-EL-AAM
Accounting Procedures, and Approval) Case No. 99-1662-EL-AAM
To Transfer its Generating Assets to an) Case No. 99-1663-EL-UNC
Exempt Wholesale Generator.)
)
- In the Matter of the Application of the)
Dayton Power & Light Company for)
Approval of its Transition Plan, for) Case No. 99-1687-EL-ETP
The Opportunity to Receive Transition) Case No. 99-1688-EL-AAM
Revenues, for Approval to Change) Case No. 99-1689-EL-ATA
Accounting Methods, and Approval to)
Amend its Tariff.)
)
- In the Matter of the Applications of)
Columbus Southern Power Company) Case No. 99-1729-EL-ETP
And Ohio Power Company for Approval) Case No. 99-1730-EL-ETP
Of Their Electric Transition Plans and)
For Receipt of Transition Revenues.)
)
- In the Matter of the Application of)
Monongahela Power Company dba) Case No. 00-02-EL-ETP
Allegheny Power for Approval of an)
Electric Transition Plan.)

**Memorandum Contra of Ohio Environmental Council
to the Industrial Energy Users-Ohio Motion to Disapprove Applications for Approval of
the Universal Service Fund Rider and the Energy Efficiency Revolving Loan Fund**

Rider as Proposed by the Ohio Department of Development and Request for Expedited Ruling

The Ohio Environmental Council ("OEC"), an intervenor in the above-captioned cases, requests that the Commission reject the Industrial Energy Users' ("IEU") Motion to Disapprove the Applications for Approval of the Universal Service Rider and the Temporary Rider designed to capitalize the Energy Efficiency Revolving Loan Fund as proposed by the Ohio Department of Development (ODOD).¹ Further OEC requests an expedited ruling in this matter so the remaining transition case settlements, along with appropriate riders for these programs, can be approved.

The OEC supports and incorporates herein the Memorandum Contra and request for expedited ruling filed by the Ohio Partners for Affordable Energy ("OPAE") and Appalachian Peoples Action Coalition ("APAC") in these cases, which also requests that the Commission deny the Motion of the IEU.

Conclusion

Wherefore, OEC respectfully requests, for the reasons set forth in the Memorandum Contra of OPAE and APAC, that the Commission deny the Motion to Disapprove filed by IEU, that the Commission incorporate the rider requested by ODOD in the applications into the final orders in the pending transition cases, and that the Commission issue an expedited ruling in this matter.

¹ See the Applications filed in Case No. 99-1729-EL-ETP and Case No. 99-1730-EL-ETP on July 13, 2000; in Case No. 99-1658-EL-ETP on July 13, 2000; in Case No. 99-1687-EL-ETP on July 13, 2000; in Case No. 99-1212-EL-ETP filed on July 11, 2000; and, in Case No. 00-02-EL-ETP on July 13, 2000.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the parties in these cases were served via electronic transmission the 14th day of August, 2000.

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