

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Edison Company, The Cleveland Electric	)	
Illuminating Company, and The Toledo	)	Case No. 14-1297-EL-SSO
Edison Company for Authority to	)	
Provide for a Standard Service Offer	)	
Pursuant to R.C. 4928.143 in the Form of	)	
an Electric Security Plan.	)	

**MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT  
BY  
MATERIAL SCIENCES CORPORATION**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code, Material Sciences Corporation ("MSC"), a division of New Star Metals, moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in this proceeding as a full party of record.

Intervention should be granted because Material Sciences Corporation has a real and substantial interest not represented by an existing party, its participation will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of issues in this proceeding. MSC incorporates by reference its Memorandum In Support of this motion.

Wherefore, Material Sciences Corporation requests that the Commission, its legal director, the deputy legal director, or the attorney examiner assigned to these matters, grant intervention in this proceeding as a full party of record.

Respectfully Submitted,

/s/ Craig I. Smith

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### **MEMORANDUM IN SUPPORT**

Pursuant to ORC 4903.221, and Rule 4901-1-11 of the Ohio Administrative Code, Material Sciences Corporation ("MSC"), a division of New Star Metals, moves the Public Utilities Commission of Ohio ("Commission") for leave to intervene in this proceeding as a full party of record.

MSC operates its MSC Walbridge Coatings, Inc. facility located in Walbridge, Ohio ("MSC Walbridge") as a state of the art manufacturing facility. MSC Walbridge utilizes a multiple functional production line, with multiple workers performing the same jobs throughout that process, to electro galvanize ("EG") or zinc-nickel ("ZnNi") plate steel coils, laminate steel coils, and coat steel coils, including using the 72" wide processing line to produce process steel and zinc-nickel electro galvanized steel for fuel tanks. The electroplating process results in very high monthly electrical demand.

MSC's operation of its MSC Walbridge facility benefits north-west Ohio, and particularly the Toledo area by employing a highly trained work force of management, technicians, and union production workers, purchasing goods and services from Ohio suppliers and firms, and paying substantial state and local taxes.

Toledo Edison serves much of the high demand caused by the electroplating process at the MSC Walbridge facility as interruptible load under ESP II through May 31, 2014, and now under ESP III through May 31, 2016. Interruptible service from Toledo Edison reduces monthly electric costs to the MSC Walbridge facility thereby its production output becomes more competitive in the marketplace.

On August 4, 2014, Toledo Edison, along with Ohio Edison and the Cleveland Electric Illuminating Company, docketed an application for authority to provide service under a Standard Service Offer pursuant to ORC 4928.143 in the form of an Electric Security Plan, identified as ESP IV, entitled Powering Ohio's Progress, for the period June 1, 2016 through May 31, 2019. Toledo Edison and the other companies request ESP IV approval by April 8, 2015.

Material Sciences Corporation moves for intervention as provided for under RC 4903.221 and OAC Rule 4901-1-11. MSC has a real and substantial interest not represented by an existing party because service under ESP IV from Toledo Edison appears to dramatically increase monthly electric costs and per kWh rates for consumption at the MSC Walbridge facility when compared to its past and current ESP services. MSC at its MSC Walbridge facility requires lower cost electric service consistent with state policies to effectively compete in the global economy. MSC's financial and business interests in the operation of MSC Walbridge as a state of the art manufacturing facility requires its participation as a full party of record since no other

person or party protects or furthers those interests as to the rates and service terms applied to the facility during ESP IV.

MSC's intervention in this proceeding as a full party of record will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and expeditious resolution of issues in this proceeding.

Wherefore, Material Sciences Corporation requests that the Commission, its legal director, the deputy legal director, or the attorney examiner assigned to these matters, grant intervention in this proceeding as a full party of record.

Respectfully Submitted,

/s/ Craig I. Smith

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#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Intervene and Memorandum in Support by Material Sciences Corporation was served this 4<sup>th</sup> day of September, 2014 by electronic mail upon the persons listed below.

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Summary: Motion Motion to intervene as a full party in record by Material Sciences Corporation electronically filed by Mr. Craig I. Smith on behalf of Material Sciences Corporation electronically filed by Mr. Craig I Smith on behalf of Material Sciences Corporation