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January 10, 2011

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 10-3066-EL-AEC

Dear Sir/Madam:

Please find enclosed an original and twenty (20) copies of **THE OHIO ENERGY GROUP'S MOTION FOR LEAVE TO INTERVENE AND MEMORANDUM IN SUPPORT** filed today in the above-referenced matter.

Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.
Cc: Gregory Price, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 10th day of January, 2011 to the following:



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

INDUSTRIAL ENERGY USERS OF OHIO
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**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Joint Application Of The :
Timken Company And The Ohio Power Company For : **Case No. 10-3066-EL-AEC**
Approval Of A Unique Arrangement For The Timken :
Company's Canton Ohio Facilities :

**MOTION TO INTERVENTION OF THE
THE OHIO ENERGY GROUP**

Pursuant to the Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group ("OEG") moves for leave to intervene in this proceeding. The Public Utility Commission of Ohio ("Commission") should grant OEG leave to intervene because OEG has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede OEG's ability to protect that interest.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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January 10, 2011

COUNSEL FOR THE OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO**

In The Matter Of The Joint Application Of The :
Timken Company And The Ohio Power Company For : **Case No. 10-3066-EL-AEC**
Approval Of A Unique Arrangement For The Timken :
Company's Canton Ohio Facilities :

**MEMORANDUM IN SUPPORT OF
THE OHIO ENERGY GROUP'S
MOTION TO INTERVENE**

Pursuant to Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11, the Ohio Energy Group (OEG) files this Memorandum in Support of Motion to Intervene.

OEG is a non-profit entity organized to represent the interests of large industrial and commercial customers in electric and gas regulatory proceedings before the Public Utility Commission of Ohio ("Commission"). OEG's members who are participating in this intervention are: Aleris International, Inc., AK Steel Corporation, ArcelorMittal, USA, BP-Husky Refining, LLC, E.I. DuPont de Nemours & Company, Ford Motor Company, Procter & Gamble Co., Linde, Inc., Praxair Inc., Severstal Wheeling and Worthington Industries. These companies purchase large amounts of electric power services from Ohio Power Company. Therefore, the interests of OEG's members may be directly affected by the outcome of this proceeding. The interests of OEG cannot be adequately represented by any other party. OEG intends to play a constructive role in this case and provide information which will assist the Commission.

No other party to this proceeding can adequately represent OEG's interest. Intervention would not unduly delay the proceeding nor unjustly prejudice any existing party.

Accordingly, OEG has a real and substantial interest and is entitled to intervene in this action under Ohio Rev. Code §4903.22.1 and Ohio Admin. Code §4901-1-11.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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January 10, 2011

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