

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of)	
Columbus Southern Power Company)	Case No. 11-4570-EL-RDR
And the Ohio Power Company to)	
Adjust Their Economic Development)	
Cost Recovery Rider Rates)	

MOTION FOR LIMITED INTERVENTION OF THE TIMKEN COMPANY

Pursuant to Section 4903.221, Revised Code and Rule 4901-1-11(D)(1) of the Ohio Administrative Code, The Timken Company ("Timken") moves for limited intervention in the above styled proceeding. The reasons supporting the limited intervention are contained in the accompanying Memorandum in Support.

WHEREFORE, Timken respectfully requests that the Commission grant this motion for limited intervention.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT OF
MOTION FOR LIMITED INTERVENTION**

Section 4903.221, Revised Code and Rule 4901-1-11 of the Ohio Administrative Code established the standard for intervention in cases before the Public Utilities Commission of Ohio.

Rule 4901-1-11(D)(1) of the Ohio Administrative Code states in part:

(D) Unless otherwise provided by law, the commission, the legal director, the deputy legal director, or the attorney examiner may:

(1) Grant limited intervention, which permits a person to participate with respect to one or more specific issues, if the person has no real and substantial interest with respect to the remaining issues or the person's interest with respect to the remaining issues is adequately represented by existing parties.

Timken has a limited interest in this case -- namely to be able to protect the information contained on Schedule No. 6 attached to the application from being disclosed in the public record. As explained in its motion for protective order, Schedule No. 6 contains Timken Manufacturing Complex monthly electric bill information, Timken Technology Center monthly electric bill information, Timken Manufacturing Complex discount as per the Commission's April 27, 2011 Opinion and Order in Case No. 10-3066, Timken Technology Center discount as per the Commission's April 27, 2011 Opinion and Order in Case No. 10-3066, and monthly Delta Revenue information relating to the Timken Manufacturing Complex and the Timken Technology Center. This confidential information is extremely sensitive and would be harmful to Timken if it were disclosed to the public. The sole purpose of Timken's motion for limited intervention is to allow it to file a motion for protective order to seek protection of the information contained on Schedule 6. Timken has a real and substantial interest in protecting

such information. No one else can adequately protect that limited interest. Granting Timken limited intervention for that purpose will not unduly delay the proceeding.

WHEREFORE, Timken respectfully requests that the Commission grant its motion for limited intervention so that the Commission can consider its motion for protective order to protect the information contained on Schedule No. 6 attached to the Columbus Southern Power Company and Ohio Power Company application in this case.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by U.S. Mail and Electronic Mail on the following persons this 2nd day of August, 2011.



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