

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|--|---|--------------------------------|
| In the Matter of the Application of |) | |
| Ohio Power Company to Adjust |) | |
| The Economic Development Cost |) | Case No. 13-1379-EL-RDR |
| Recovery Rider Rates |) | |

**MOTION FOR LEAVE TO INTERVENE
AND MEMORANDUM IN SUPPORT**

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,

VORYS, SATER, SEYMOUR AND PEASE LLP

By: s/ Michael J. Settineri
M. Howard Petricoff
Michael J. Settineri
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
(614) 464-5462 Telephone
(614) 719-5146 Facsimile
mhpetricoff@vorys.com
mjsettineri@vorys.com

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

On August 1, 2013, Ohio Power Company (“Ohio Power”) filed an application in this proceeding to adjust its economic development cost recovery rider (“EDR”) to recover economic development amounts authorized by the Commission. In its application, Ohio Power referenced its unique arrangement with Timken (approved by the Commission in Case No. 10-3066-EL-AEC) and included information specific to Timken to support Ohio Power’s adjustment to the EDR.

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. 2 and 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. Schedule No. 2 contains estimated and actual delta revenue data that reflects usage at Timken's facilities. 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 No. 2 and Schedule No. 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. 2 and Schedule No. 6 attached to the application in this case.

Respectfully submitted,

VORYS, SATER, SEYMOUR AND PEASE LLP

By: s/ Michael J. Settineri

M. Howard Petricoff

Michael J. Settineri

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

(614) 464-5462 Telephone

(614) 719-5146 Facsimile

mhpetricoff@vorys.com

mjsettineri@vorys.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served upon the following persons by
U.S. Mail and electronic mail this 10th day of September, 2013:

Matthew J. Satterwhite
Steven T. Nourse
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-1608
Facsimile: (614) 716-2950
stnourse@aep.com
mjsatterwhite@aep.com

Samuel C. Randazzo
Frank P. Darr
Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

s/ Michael J. Settineri
Michael J. Settineri

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Case No(s). 13-1739-EL-RDR

Summary: Motion for Leave to Intervene and Memorandum in Support electronically filed by Mr. Michael J. Settineri on behalf of The Timken Company