

In the Matter of the Application of)
Ohio Power Company to Adjust)
The Economic Development Cost) **Case No. 14-193-EL-RDR**
Recovery Rider Rates)

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**MEMORANDUM IN SUPPORT OF THE
SUPPLEMENTAL MOTION FOR TO INTERVENE**

On February 3, 2014, 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 and TimkenSteel Corporation have an interest in this case – in part, to be able to protect the information contained on Schedule No. 2, Schedule No. 2.1, Revised Schedule No. 2.1, Schedule No. 2.1A, Revised Schedule No. 2.1A, Schedule No. 6 and Schedule No. 6.1 attached to the application, as supplemented on February 21, 2014, from being disclosed in the public record. As explained in its motion for protective order, Schedule No. 6 and Schedule No. 6.1 contain 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, Schedule No. 2.1, Revised Schedule No. 2.1, Schedule No. 2.1A and Revised Schedule No. 2.1A contain 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 and TimkenSteel Corporation if it were disclosed to the public. One of the purposes of Timken's and TimkenSteel Corporation's supplemental motion for intervention is to allow the filing of a supplemental motion for protective order to seek protection of the information contained on Schedule No. 2, Schedule No. 2.1, Revised Schedule No. 2.1, Schedule No. 2.1A, Revised Schedule No. 2.1A, Schedule No. 6 and Schedule No. 6.1. Timken and TimkenSteel Corporation have a real and substantial interest in protecting such information. No one else can adequately protect that limited interest. Granting Timken and TimkenSteel Corporation intervention for that purpose will not unduly delay the proceeding.

To the extent that any other party seeks a hearing or raises issues in Case No. 14-193-EL-RDR that would directly or indirectly adversely affect the unique arrangement approved in Case No. 10-3066-EL-AEC or the joint application to amend the unique arrangement filed in Case No. 10-3066-EL-AEC, Timken and TimkenSteel Corporation seek full intervention in this case so as to be able to protect that interest.

WHEREFORE, Timken and TimkenSteel Corporation respectfully request that the Commission grant their supplemental motion to intervene so that the Commission can consider the supplemental motion for protective order to protect the information contained on Schedule

No. 2, Schedule No. 2.1, Revised Schedule No. 2.1, Schedule No. 2.1A, Revised Schedule 2.1A, Schedule No. 6 and Schedule No. 6.1 attached to the application, as supplemented, in this case, and so that Timken and TimkenSteel Corporation can protect their interest in this proceeding should other issues be raised or should this matter go to hearing.

Respectfully submitted,

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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 26 day of February, 2014:

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