



March 7, 2014

Ms. Barcy McNeal
Secretary, Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: In the Matter of the Joint Application of the Timken Company and the Ohio Power Company
for Approval of a Unique Arrangement for the Timken Company's Canton, Ohio Facilities,
Case No. 10-3066-EL-AEC.

Dear Secretary McNeal:

The Office of the Ohio Consumers' Counsel (OCC) is writing to state and explain its non-opposition to the Joint Application. OCC's statement in this letter is confined to the unique circumstances of the Joint Application, and is not a precedent or position for any other case or matter.

The Timken Company and the Ohio Power Company have a Unique Arrangement that provides for electricity discounts to the Timken Company for purposes of economic development. The Unique Arrangement was approved by the Public Utilities Commission of Ohio (PUCO) on April 27, 2011. On Friday, February 21, 2014, the Timken Company, TimkenSteel Corporation, and the Ohio Power Company (Joint Applicants) filed an Application to Amend the Unique Arrangement.

The Joint Applicants represent that the purpose of the Application is to update the existing Unique Arrangement to reflect the separation of the Timken Company's steel operations into a new business entity (TimkenSteel) and to assign the Unique Arrangement to that entity. During conversations with OCC, TimkenSteel's Counsel represented that, with the exception of the revised employment commitment and the new entity, the Unique Arrangement will remain intact. OCC understands this representation and the Joint Application to mean that the commitments in the original Unique Arrangement will be maintained by TimkenSteel, including the commitment that: it will not seek waiver of the energy efficiency/peak demand reduction rider or seek additional cash payments for the conservation projects enabled by the Unique Arrangement; it will allow Ohio Power and the PUCO Staff to measure and verify the energy savings resulting from the Unique Arrangement; and it will allow Ohio Power to interrupt the same or a greater portion of TimkenSteel's load, on request.

Given the Joint Application (which would continue the Unique Arrangement previously approved by the PUCO), the representation to OCC by TimkenSteel's Counsel, and the corporate structure changes described in the Joint Application, OCC does not oppose the Joint Application. OCC appreciates that TimkenSteel approached OCC to discuss the issues in advance of its filing and

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continued that discussion for OCC's questions after the filing, regarding the economic development program and related commitments.

Sincerely,

/s/ Maureen R. Grady

Maureen R. Grady
Assistant Consumers' Counsel

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing letter upon the parties listed below by electronic transmission this 7th day of March, 2014.

/s/ Maureen R. Grady

Maureen R. Grady
Assistant Consumers' Counsel

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Summary: Correspondence Letter Regarding the Joint Application of the Timken Company and Ohio Power Company by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Grady, Maureen R. Ms.